Jessica L. Gonzalez

Seriior Counsel BP Legal





BP America Inc. 150 W. Warrenville Road Mail Code 200-1W Naperville, Illinois 60563 Direct: (630) 420-3749 Fax: (630) 420-5172 jessica gonzalez@bp.com

ORIGINAL

VIA FEDERAL EXPRESS

October 17, 2014

Kenneth I. Rose III, Financial Analyst (3HS62) U.S. Environmental Protection Agency, Region III 1650 Arch Street Philadelphia, PA 19103-2029

Re: Supplemental Response — Metro Container Site, Trainer, Pennsylvania

Dear Mr. Rose:

This letter constitutes a supplemental response ("Response") of BP America Inc. ("BP") to the United States Environmental Protection Agency's ("USEPA") CERCLA Section 104 Requests for Information ("Requests") addressed to BP America, Inc., received on March 26, 2012, and Capital Lubricants Company, Incorporated, received on or about April 20, 2012. USEPA was seeking information concerning a release or threat of release of hazardous substances, pollutants, or contaminates at the Metro Container Corporation Site in Trainer, Pennsylvania ("Site"). BP's original response was provided on July 12, 2012 (the "July 2012 Response").

Another party in this matter recently brought to BP's attention that it was aware that certain BP entity documents responsive to the Requests were not provided in its July 2012 Response. At that point, BP made a diligent effort to perform a subsequent review of the documents that might be responsive to the Requests. During this latest review, additional responsive files were identified. BP apologizes for this oversight.

Given the subsequent review and identification of additional responsive documents, BP now supplements its original response. Attachment A provides the specific Requests to which BP is supplementing its response. Attachment B is a list of the documents being provided on CD.

BP submits this supplemental response pursuant to and re-iterating the objections previously set forth in its July 2012 Response. Of particular significance, BP generally objects to supplying documents that are readily available in the public domain (such as public libraries, public document repositories, and the files of any branch of the federal, state or local government), including but not limited to any publicly available documents relating to the Lyondell bankruptcy and the Metro Container Site as a U.S. Additional CERCLIS/NPL Site thereunder. In addition, BP objects to producing any documents protected by the attorney-client communication privilege or attorney work product privilege, including those that may have been shared among the former Metro PRP Group members and subject to the Joint Defense Agreement governing those communications.

BP apologizes for the delay in providing these documents and any inconvenience this may have caused. BP retains the right to supplement this response should additional information be discovered that is responsive to the Request.

Sincerely,

Jessica L. Gonzalez

Enclosure

J_G:tlr

ATTACHMENT A

- 1. USEPA has information which indicates that you sent drums to the Metro Container Site between 1980-1988 from one of more of your facilities. For each such facility, identify:
 - a. The address of the facility; and
 - b. The products/materials produced at such facility between 1980-1988.

Response to Question 1

In addition to the facilities identified in the July 2012 Response, BP has identified various vendors with which BP arranged for the transportation and disposal of empty 55 gallon drums to the Metro Container Site. These vendors included, but may not have been limited to, the following:

Vendor

AC&T Co. Inc., Hagerstown, MD Accurate Screwing Machine, Columbus, NJ Brinker Fuel, Doylestown, PA Carl King, Camden, DE Hutter, Inc., Jonestown, PA Jay Gress, Norristown, PA Kellam Propane Gas Company Inc., Belle Haven, VA Kawneer Co., Inc., Harrisonburg, VA Manassas Ice and Fuel Co., Inc., Manassas, VA Solar Compounds, Linden, NJ Paterson Motor Oil, Peterson, NJ Pedroni Fuel, Vineland, NJ Polt Bus Services, Lebanon, NJ Solar Compounds Corp, Linden, NJ The Oil Man, Hurrfville, NJ Tri Gas & Oil, Fredericksburg, MD Troutman's Oil Service, Millersburg, PA United Oil Company, Baltimore, MD Wainwright Oil, Dryden, NY Wilkinson Industries, Franklinville, NJ Wilson Mushroom Company, Avondale, PA

Transporter

Glasgow, no location identified Houff Transfer, Weyers Cave, VA Oneida Motor Freight, Carlstadt, NJ Proctor Express Inc., Delair, NJ Metro Chemical, Trainer, PA As previously described in BP's July 2012 Response, due to the divestment of assets and the consolidation of companies within BP and its predecessor companies during the last 30 years, most if not all of the files related to those facilities and the vendors that they utilized remained with the operating assets and their new owners. In addition, BP has closed various regional offices and it is possible that some of the boxes with materials related to these entities and their vendors may have been lost or misfiled during those various moves.

6. Identify all chemicals/constituents that would have been present in drums present at any time between 1980-1988 at the facilities identified in response to Question # 1(a).

Response to Question 6

After a further review of corporate records, BP located additional documents describing the use of the Metro Container Site for the disposal of empty 55 gallon drums from various heritage BP companies. Specifically, the documents identified on Attachment B and included on the enclosed CD relate to the use of the Metro Container Site by heritage Atlantic Richfield entities and their vendors. BP reserves the right to supplement or amend this response should additional information become available.

7. Identify the number of drums/containers sent to Metro Container Site from the facilities identified in response to Question #1.1

Response to Question 7

See Reponse to Question #6. The documents included on the encolosed CD provide information concerning the potential number of drums sent by various BP and non-BP entities.

9. Identify the chemicals/constituents contained in the drums you sent to the Metro Container Site.

Response to Question 9

Please see Responses to Questions #1 and #6.

10. If you assert in response to Question #9 that some or all of the drums sent to the Metro Container Site were empty, identity the chemicals/constituents that would have been in the drums before they were emptied.

¹ Note: this question was included in the Request sent to BP America, Inc. but not in the Request sent to Capital Lubricants Company, Incorporated.

Response to Question 10

Please see Responses to Questions #1 and #6.

11. Identify, and provide a copy of, all contracts and agreements between you and . Metro Container Corporation or any related entity under which drums were sent from your facilities to the Metro Container Site.²

Response to Question 11

Please see Response to Question #6.

12. Provide the name, title, address, and telephone number of the person answering these questions on your behalf. For each question, provide the name, title, area of responsibility, current address, and telephone number of all persons consulted in preparation of the answers.

Response to Question 12

In addition to the persons identified in the July 2012 Response, the following person was also consulted in preparation of this supplemental response:

Sherry Morris, Paralegal 501 Westlake Blvd., WL 1 16-187 Houston, TX 77079 281-366-3177

² Note: this question is quoted as included in the Request to BP America, Inc. A similar, though not exact, question was posed as #11 in the Request sent to Capital Lubricants Company, Incorporated.

ATTACHMENT B

- 1. 1985 Carl King ARCO Products Documents.pdf
- 2. 1985-1988 ARC-Metro Container Transaction Documents.pdf
- 3. 1986 Carl King ARCO Products Documents.pdf
- 4. 1987 Carl King ARCO Products Documents.pdf
- 5. 1988-5-9 ARCO Response to EPA RFI.pdf
- 6. 1988-6-2 Atlantic Refining Letter to EPA pdf
 - a. 1988-6-2 Letter Attachment A.pdf
 - b. 1988-6-2 Letter Attachment B.pdf
 - c. 1988-6-2 Letter Attachment C.pdf
- 7. 1989-3-5 Draft Metro Container PRPs Drums Contributed.pdf
- 8. 1989-3-8 Saul Ewing Remick Saul Transmitting Booz-Allen Database.pdf
- 9. 1989-5-30 Saul Ewing Remick Saul Letter to EPA and attachments pdf
- 10.1989-5-31 Saul Ewing Remick Saul Letter to Atlantic Richfield Company.pdf
 - a. 1989-5-31 SERS Letter Attachment A.pdf
 - b. 1989-5-31 SERS Letter Attachment B.pdf
 - c. 1989-5-31 SERS Letter Attachment C.pdf
 - d. 1989-5-31 SERS Letter Attachment D.pdf
 - e. 1989-5-31 SERS Letter Attachment E.pdf
- 11.1989-7-14 PRP Drum Report ARCO Chemical-BP pdf
- 12.1989-7-14 PRP Drum Report Sun.pdf
- 13.1989-10-9 ARCO Letter to Lyondell.pdf
- 14.1990-1-29 Flippo Oil Letter to ARCO Products pdf
 - a. 1990-1-29 FO Letter Attachment 1.pdf
 - b. 1990-1-29 FO Letter Attachment 2.pdf
 - c. 1990-1-29 FO Letter Attachment 3.pdf
- 15.1990-2-14 Metro Container Draft Database Report.pdf
- 16.1990-2-28 Saul Ewing Remick Saul Notice Letter to PRPs.pdf
- 17.1990-5-4 ARCO Internal Memo Summarizing Metro.pdf
- 18.1990-6-15 Sun Indemnity Letter to Lyondell.pdf
- 19. 1990-8-31 Lyondell Letter Atlantic Richfield.pdf
 - a. 1990-8-31 Lyondell Letter Attachment A.pdf
- 20. No Date Metro Container Supplier of Drums List.pdf

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Receipt for Return of Empty **Containers and Merchandise**

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(8-82)

APPC-3173

AtlanticRichieldCompany 🦠

Sales Agreement – Surplus Equipment

Purchasing department

Philadelphia Date

3-14-86

Sale number

10654

Buyer

Metro Container Company 2nd and Price Streets Trainer, Pa. Attn: Pete Levy

(=552) (200)

Agreement of sale of the following materials:

Approximately 500 - 55 gallon steel used drums

Any reference to size, quality, capacity or grade is for identification purposes only and not a warranty expressed or implied as to condition or quality or capacity of performance capability of the item. Buyer acknowledges he has inspected the above material and is aware of its condition.

Time and place of delivery:

Your pickup at Central Warehouse, Schuylkill and Lanier Avenue,

Philadelphia, Pa. 19145

Price:

\$2.00 ea. "AS IS WHERE IS"

Sales tax:

Unless Buyer files exemption certificate with Atlantic Richfield, all applicable state and othe governmental sales taxes will be due and payable in addition to the price stated above.

Terms:

Net cash upon receipt of invoice. Your check payable to & Marketing Corp., P.O. Box 20111, Philadelphia, Pa. 19145

Atlantic Refining

General

You agree to do all handling removing these drums. ____ You are to contact Jerome Jones to make arrangements for removal. Ris phone is 339 2336.

Carol Robinson Sophie Mazurek Karen Beeman Jerome Jones H. D. McDaniel File

Marquet Sh. Mare

AtlanticRichfieldCompany



Sales Agreement-Surplus Equipment

Purchasing department Philadelphia

Date 7-10-85

Sale number

10642

Buyer

Metro Container Company 2nd and Price Streets Trainer, Pa. Attn: Mrs. Arnold

Agreement of sale of the following materials:

Approximately 600 - 55 gallon steel used drums.

These drums will be available at various times through the period July 1, 1985 and December 31, 1985.

Any reference to size, quality, capacity or grade is for identification purposes only and not a warranty expressed or implied as to condition or quality or capacity of performence capability of the item. Buyer acknowledges he has inspected the above material and is gware of its condition.

Time and place of delivery:

Your pickup at Central Warehouse, Schuylkill and Lanier Avenue,

Philadelphia, Pa. 19145

Price:

\$2.00 ea. "AS IS WHERE IS"

Sales tax:

Unless Buyer files exemption certificate with Atlantic Richfield, all applicable state and other governmental sales taxes will be due and payable in addition to the price stated above.

Terms:

Net cash upon receipt of invoice. Your check payable to Arco Petroleum Products Company, 3144 Passyunk Avenue, Philadelphia, Pa. 19145.

General

You agree to do all handling removing these drums. Yourare to contact Jeroma Jones to make arrangements for removal. His phone is 339 2336.

CELLE

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Metro Container Corporation

Second & Price Street Trainer, Pennsylvania 19013

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Metro Container Corporation

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Metro Container Corporation

(215) 627-7288

Second & Price Street Trainer, Pennsylvania 19013

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(215) 627-7288

Metro Container Corporation

Second & Price Street
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2. (Canary) - Area Coord.

3. (Pink) - Area Foreman

4. (White) - Originator

Distribution: Original (White) - Data Center



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4. (White) - Originator

3. (Pink) - Area Foreman

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2. (Canary) - Area Coord.

Distribution: Original (White) - Data Center

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CARL KING, INC. 109 So. MAIN St. CAMDEN, DELA. 19934

ARCO Petroleum Products Company Division of AtlanticRichfieldCompany Receipt for Return of Empty

Containers and Merchandise

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ARCO Petroleum Products Company
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Receipt for Return of Empty
Containers and Merchandise

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CARL KING, INC. 109 SO. Main St. Camden, DELA 19934

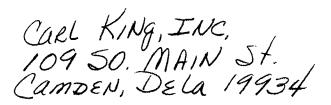
ARCO Petroleum Products Company Division of AtlanticRichfieldCompany Receipt for Return of Empty

Containers and Merchandise

No. 078548

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APPC-3173

ARCO Petroleum Products Company Division of AtlanticRichfieldCompany Receipt for Return of Empty

Containers and Merchandise No. 078549

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ARCO Petroleum Products Company Division of AtlanticRichfieldCompany Receipt for Return of Empty Containers and Merchandise

No. 078550

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Receipt for Return of Empty
Containers and Merchandise

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APPC-3173

ARCO Petroleum Products Company

Receipt for Return of Empty **Containers and Merchandise** No. 078545

Name (mailing address if other than above) Stock 9 movement 1 code Street address City, state, zip code Approved Send A/C check Cash Net amount of inv. Attach Late Payee code Due date X=cr. Invoice date Reference no. Check no. Type C X == Tax Amount subject Account Cost Center Facility Туре Free form area Net amount code to tax Packages Unit price Price + Tax Tax Articles received are subject Product Quantity Amount to inspection at our warehouse code Kind Code No. \$ State Fed \$ 1-97493 Empty 55 gallon drums 55D 001 000 000 1-62760 \$6.00 000 **Pallets** RECEIVED SEP 1 0 1986 METRO CONTAINER CORP Reason for return Plus sales tax Purchase date Original delivery Product returns show arious Total invoice number Received by Approved by Received into stock by

Customer

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METRO CONTAINER CORP TRAINER PA

ARCO Petroleum Products Company Division of AtlanticRichfieldCompany Receipt for Return of Empty

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Containers and Merchandise

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(215) 627-7288

Metro Container Corporation

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(215) 494-8200

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Metro Container Corporation

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(215) 627-7288 Trainer, Pennsylvania 19013 (215) 494-8200

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Metro Container Corporation

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1221 McKinney Stret Mailing Address: Box 3646 Houston, Texas 77253-3646 Telephone 713 652 7322

> C. A. "Cab" Baldwin Senior Attorney

CERTIFIED MAIL RETURN RECEIPT REQUESTED

May 9, 1988

Lawrence Falkin
U. S. EPA, Region III
CERCLA Removal Enforcement Section (3HW14)
841 Chestnut Building, 6th Floor
Philadelphia, Pa. 19107

Re: Metro Container Corporation Site

Dear Mr. Falkin:

Your request for information on the above-referenced subject dated April 12, 19888 was not received at this office until April 25, 1988. By telephone conversation on that date you agreed to extend the deadline for our response until May 9, 1988. While the request refers to Lyondell Petrochemical Corporation, please be advised that such entity has conducted no business related to site. Our answers will refer to Lyondell "LPC"). Petrochemical Company (hereinafter following information reflects the extent of knowledge at this particular time and is numbered to correspond to the designated questions in your original request letter:

- 1. None.
- 2. LPC purchased reconditioned drums from the site operator. LPC neither owned drums at the site nor transported drums to the site.
- 3. No hazardous substances and/or containers of such were sent to, transported to, or disposed of at this site.
- See answer to Question 3.
- 5. See answer to Question 3.

- 6. See answer to Question 3.
- 7. None.
- 8. See answer to Question 3.

I am the custodian of such documents as have been discovered at this time. I have requested appropriate business functions of the Company to forward such documents to me. The documents are generally described as contracts for puchase of reconditioned drums and correspondence relating thereto from 1985 thru 1987.

I am unsure whether any insurance contracts entered into on behalf of the Company would cover CERCLA response costs in light of the existing judicial precedents.

Sincerely,

C. A. Baldwin

CAB/ac enc.

b-5c/metro.ltr



Atlantic Refining & Marketing Corp.

 1016 West Ninth Avenue King of Prussia Post Office Box 1050 Southeastern, Pennsylvania 19398-1050

215/768-1000

CERTIFIED MAIL

June 2, 1988

Mr. Lawrence Falkin U.S. Environmental Protection Agency, Region III CERCLA Removal Enforcement Section (3HW14) 841 Chestnut St., 6th Floor Philadelphia, PA 19107

RE: METRO CONTAINER CORPORATION SITE

Dear Mr. Falkin:

In response to your letter concerning the Metropolitan Container site (undated but received in our office May 20, 1988) ATLANTIC has once again examined its procedures in the handling of empty surplus storage drums.

We are confident that the information relayed to your office on April 22, 1988 regarding our normal procedures for the handling of surplus storage drums has been complied with in all respects. You will recall our in-house procedure required cleaning and the removal of bungs prior to making drums available for salvage sale.

As a result, it is our assessment that Atlantic Refining & Marketing Corp. is not a potentially responsible person and feel we have no liability in the Metropolitan Container site contamination.

Thank you for your courtesies in this matter.

Thomas S. Stammel Associate Counsel

truly-wours.

TSS:1h149

cc: J. Pitts

R. McIntire

T. Ulrich



Atlantic Refining & Marketing Corp.

 1016 West Ninth Avenue King of Prussia Post Office Box 1050 Southeastern, Pennsylvania 19398-1050

215/768-1000

(215) 768-1407

CERTIFIED MAIL RETURN RECEIPT REQUESTED

April 22, 1988

Mr. Lawrence Falkin
U.S. Environmental Protection Agency, Region III
CERCLA Removal Enforcement Section (3HW14)
841 Chestnut Building, 6th Floor
Philadelphia, PA 19107

RE: METRO CONTAINER CORPORATION SITE

Dear Mr. Falkin:

The EPA informational inquiry regarding the Metro Container Corporation site has been directed to this office for response. After a careful search of our records and procedures, I would offer the following:

- 1. Enclosed please find copies of our internal procedures for storage drum cleaning and disposal. You will note the procedures are dated August 11, 1981 and were issued by Atlantic Richfield Company, the predecessor owner of the Atlantic Refining & Marketing Corp. facilities. I am informed that the cleaning and removal of bungs is still strictly adhered to. Once cleaned, the empty drums are available for salvage sale.
- 2. Since several hundred drums are prepared (cleaned, etc.) for salvage each month, records are not maintained as to their former contents.
- 3. Enclosed please find gate passes for empty drums sold to Metro as well as a series of Metro Container Corporation Purchase memos.
- 4. A memorandum to Ms. Marge Moore dated March 12, 1986 indicating that approximately 500 washed (cleaned)

drums were available for salvage sale.

- 5. Copies of two surplus equipment sales agreements between Atlantic Refining & Marketing Corp. and Metro Container dated July 10, 1985 and March 14, 1986.
- 6. Job orders 83068, 83083, 83124, 83137 ordering the cleaning of drums and placement in the barrel lot (upside down) when cleaned.
- 7. Atlantic Refining & Marketing Corp. has no real estate interest in the property of Metro Container.
- 8. All drums, when properly cleaned per our policy statement were sold "as is" to Metro Container and Atlantic retained no incidents of ownership.

I hope the information of this correspondence and the enclosures are helpful in your inquiry. If I can provide you with any additional data, please feel free to contact me at my dial direct number listed above.

Thomas S. Stammel Associate Counsel

truly xours,

TSS:1h 98

Enclosures

cc: R. McIntire

File: 403040



Date:

August 11, 1981

Subject:

Drum Disposal

From/Location: James A. Pierce

To/Location:

Messrs. H. Kohut

R. G. Lindquist

The Maintenance Department and the Environmental Section are currently disposing of the many drums located in the South Yard Drum Storage Area.

Any reusable products are being recovered and sent to the appropriate refinery location. Unusable products are being disposed of according to EPA regulations.

In order to prevent a similar accumulation of drums, the new policy will be to ship only those drums which have been emptied and rinsed out with water to the Salvage Yard. Residue of lubricating oil drums can be dumped to the sewer. However, before emptying any other drums, consult the Environmental Section for appropriate directions. To enforce this policy only drums which are stored upside down with the bungs removed will be picked up by Central Trucking.

Please pass this information on to the appropriate Operations personnel. If you have any questions contact Nancy McDevitt on extension 2075.

NPM:bap

cc: Messrs. M. D. Colmery

H. D. McDaniel

G. P. Rabik

M. S. Schillinger

G. E. Smith

AtlanticRichfieldCompany	Internal Correspondence			4
	To: May More From: Haun Kinn Subject: Led Dunn Date: Marah 12		AA 10654	*
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ARCO (>

Legal 1055 West Sevent reet P.O. Box 2570 Los Angeles, California 90051-0570 Telephone 213 486 1572

John C. Laager Senior Attorney

October 9, 1989

C.A. Baldwin
Lyondell Petrochemical Company
One Houston Center
1221 McKinney
Suite 1600
P.O. Box 3646
Houston, TX 77253-3646

Re: Metro Container

Dear Cab:

Thank you for your letter and enclosure dated September 6, 1989.

Pursuant to our telephone conversation, I spoke with Carl Everett of the Metro Container PRP Committee and advised him that ARCO Products Company was declining to join the Committee. As per your request, I did not identify Lyondell, but explained that the drums that had been allocated to ARCO Products Company by EPA were not ours. Before speaking to him, I made a courtesy telephone call to Dave Noble of ARCO Chemical, who is also on the PRP Committee, and again did not mention Lyondell's name.

I have not heard anything back from either the PRP Committee or EPA. Pursuant to our conversation, if we receive further demands relating to this site, we will pass them along to Lyondell unless they relate to some kind of involvement between the Philadelphia Refinery or other ARCO Products Company facility and Metro Container. At the present time, we have no knowledge of any such involvement.

Thank you again for your cooperation and help.

Sincerely,

John C. Laager

cc: K. Riley

R. Morse, Esquire

COMPANY NAME	DRUMS SENT TO METRO
400 AND 400 AN	
MOBIL OIL COMPANY	230,493
CHEVRON	64,713
B. P. OIL COMPANY	29,428
E. I. DUPONT	23,265
FRITCH FUEL CO.	21,216
ARCO PETROLEUM PRODUCTS CO.	15,891
REX OIL CO.	15,271
SUN OIL CO.	14,096
AFCO	13,182
HOUFF TRANSFER CO.	12,632
CALLAHAN CHEMICAL CO.	11,779
JAY GRESS INCORPORATED	
	8,867 3,735
GULF OIL	8,735
NATIONAL SOLVENT	7,565
WHITE OIL CO.	6,736
KAISER ALUMINUM & CHEMICAL CORP.	5,590
LANEY OIL CO. INC.	5,543
J. B. HUNT TRANSPORT CO. INC.	5,031
SUPERIOR	4,622
AABCO STEEL DRUM, INC.	4,317
MARINE LAUNCH	3,589
OCCIDENTAL CHEM & PLASTICS	3,525
PETROLEUM	3,427
CARLOS R. LEFFLER INC.	3,295
ARCO CHEMICAL CO.	3,28 <i>7</i>
JTM DRUM	3,220
ALUMAX ALUMINUM CORPORATION	3,126
CAPITAL LUBRICANTS	2,708
E. J. KOENIG	2,506
S. W. RAWLS INC.	2,349
CONESTOGA FUEL	2,114
FISHER BODY - DIVISION OF GENERAL MOTOR	
HERR'S MOTOR EXPRESS	1,995
D & B EXPRESS	1,963
PHOTO & ELECTRIC	1,963
SCHUCHART INC.	1,868
HOOKER & HOLLOWELL OIL CO.	1,834
MOORE BROS. OIL CO.	1,794
INDUSTRIAL SOLVENTS & CHEM. CO.	1,733
ACME INC.	1,550
SAVANNAH OIL & CHEMICAL	1,448
K. SALES INC.	1,390
SOUTHERN LUBRICANTS	1,377
ILLEGIBLE	1,359

** DRAFT **

METRO CONTAINER
PRPs IN ORDER OF DRUMS CONTRIBUTED (1985, 1986, AND 1987)

COMPANY NAME	DRUMS SENT TO METRO
SOUTHERN OIL CO.	1,356
AVTEX FIBERS INC.	1,289
REIT LUBRICANTS CO.	1,236
ASHEVILLE OIL CO.	1,141
P. H. GLATFELTER CO.	1,116
MIDWAY OIL & GAS	
PHOENIX INC.	1,007
CAROLINA FREIGHT CARRIERS	981
NATIONAL CAN CORPORATION	929
	910
SUN REFINING & MARKETING	897
REIT SERVICE CO.	857
HOME OIL	832
AUTOMOTIVE SERVICE INC.	809
NEW RIVER OIL CO.	771
MAUGER & CO.	741
CAMPBELL OIL CO.	720
PA. POWER & LIGHT CO.	708
SPENCER BROTHERS INC.	706
SLF PARTNERSHIP T/A CONSUMER OIL	699
WAY OIL CO.	656
BLUE GRASS OILS INC.	635
CARL KING INC.	628
MARTIN OIL COMPANY	598
W. H. JOHNS	565
LEHIGH GAS & OIL	56 4
HERR'S	563
W. K. HOBBS INC.	551
MONMOUTH PETROLEUM CO.	536
KIMBERLY CLARK	531
FRANK M. POWELL	526
TRI GAS & OIL	516
BARKSDALE OIL	510
GOODRICH PETROL	506
CARROLL'S TRANSFER	496
CHATHAM OIL CO.	489
PAUL BRADIGAN & SONS	
	476
SADLER BROTHERS OIL	466
SILVER EAGLE	464
KENTILE FLOORS	461
TRI STATE PETROL	459
MDA ASSOC.	456
DANA CORPORATION	454
CENTRAL LUBE	445
PETROLEUM WORLD	426
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COMPANY NAME	DRUMS SENT TO METRO
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ROOT OIL CO.	43.2
LOCKER OIL CO.	413 405
KESSLER CHEMICAL	
MANASSAS ICE & FUEL	395
	385
FISHER GUIDE	.373
GB HOOBER & SONS PHILADELPHIA GEAR CORP.	364
	362
PEDRONI FUEL CO.	346
EASTERN INDUSTRIES	340
STAR OIL	324
SCHULTZ LUBRICANTS	323
VALLEY PETROLEUM INC.	319
PEOPLES GAS & OIL	301
FIRST STATE STEEL DRUM CO.	297
DON P. MEISTER	291
STOCKMAN OIL	288
STROH BREWERY CO.	282
STACKMAN OIL	282
AUTOLINE LUBRICANTS	281
AMERICAN KOYO	276
TAYLOR	276
ATLANTIC REFINING AND MARKETING	269
DANIELSON OIL CO.	268
PTL INTERNATIONAL	267
OVERNITE TRANSPORTATION COMPANY	264
C. L. MACK INC.	261
WILLIAM L. GIFT	258
MARIN OIL SERVICE	252
HOUGHTON	250
LIBERTY OIL CO.	248
ALTMAN DISTRIBUTION CO.	246
DELMARVA POWER & LIGHT	245
FEGLEY OIL CO.	244
PEOPLES OIL & GAS	234
TAYLOR OIL CO.	232
MATTHEWS BROS.	232
HERCULES CORPORATION	232
TEVIS OIL CO.	232
EASTERN STEEL DRUM DIV.	229
PHILA. ELECTRIC CO.	229
TILLEY CHEMICAL CO.	228
ERIE PETROL	228
GRUMMAN AEROSPACE	227
MARK CAIN TRUCKING	224
MARK CAIN INUCAING	4 4 T

PRPs IN ORDER OF DRUMS CONTRIBUTED (1985, 1986, AND 1987)

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COMPANY NAME	DRUMS SENT TO METRO
40 40 40 40 40 40 40 40 40 40 40 40 40 4	60 50 60 60 60 60 60 60 60 60 60 60 60 60 60
DEAN OIL COMPANY	224
WARREN OIL CO.	222
MD ASSOCIATES SILVER EAGLE	222
ACE AUTO SUPPLY CO.	
A. C. & T. CO. INC.	220 217
SUMTER PETROLEUM	_
	217
WITTER OIL & GAS	216
LYONDELL PETROCHEMICAL	208
R & W OIL	204
B & D TRANSFER INC.	204
ALGONQUIN CHEMICAL CO.	202
CORBEY CEMENT	202
SEDLER BROS. OIL	200
TIOGA PETROLEUM	200
SUN TECH	199
MC MATER OIL	192
BETHLEHEM MINES CORP.	191
G. W. DAVIS OIL CO.	189
SANDRI INC.	184
AMF INC.	183
STALINER OIL	182
MCT SERVICES	182
JACK A. ALLEN	180
GUTTMAN OIL CO	176
AMERICAN OIL SUPPLY	175
GUARD ALL CHEMICAL CO	174
BUDD COMPANY	173
DUKE HEATING OIL	173
DELMARVA OIL CO.	172
BELT, GAS & ELECTRIC	172
PSE&G	172
OCCIDENTAL CHEMICAL	170
U.S. METAL & REFINING	170
CONSUMER OIL CORP.	169
EGON OIL & SUPPLY	169
BILTMORE OIL CO	169
WESTFALL ACE DRUM CO.	168
A & B	167
KELLAM PROPANE	166
FARRED CO-OP	165
JOHNS MOTOR FREIGHT	165
SCHIOVOME CONSTRUCTION	165
CROWN CORK & SEAL	164
CHABOT'S PETROL	163

COMPANY NAME	DRUMS SENT	TO METRO
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NELSON OIL CO.		162
BEALL OIL CO.		161
PETROLEUM WAND		160
B. L. JEHU		160
MCMACKIN		160
STANDARD BOAT COMPANY		160
TRANSAMERICA DELAVAL		159
ALLERMAN		158
W F HOBBS		157
JAMES RIVER/REGAL DIV.		156
CHARLES COAL & OIL		155
BRINKERS FUEL		152
J. O. COOK		148
BERKEBILE OIL CO.		146
PHILA. GAS WORKS		146
MCINTOSH ENERGY STANLEY OIL CO.		144
RAY PEPPELMAN INC.		144 142
R. J. STEPHENSON		142
POLIT FREIGHT CARRIES		142
JACK A. AKEN		138
ST. JOHNSBURY TRUCKING		137
FALCON OIL CO.		136
ADAM UGG OIL CO.		135
L.R.WATERS		134
DIVERSIFIED LUBRICANTS		134
SHELLHORN, INC.		132
FLIPPO'S OIL CO.		132
HAHN OIL. INC.		130
HAHN OIL, INC. SNEDECKER OIL CO.		128
HARRED OIL CO.		127
WAINWRIGHT OIL CO.		126
PROLERIZED SCHIABO		126
BETH ENERGY MINES		126
QUARKS PETROLEUM CO		124
WARNER OIL CO.		124
SUBURBON OIL CO.		124
CERTAIN TEED CORP.		122
SHELLHORN OIL	-	122
U.S. STEEL CORP.		121
KELLAM ENERGY		120
B.M.Y.		119
DENA CORPORATION		118
PRINT BAY FUEL		117

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METRO CONTAINER
PRPs IN ORDER OF DRUMS CONTRIBUTED (1985, 1986, AND 1987)

COMPANY NAME	DRUMS	SENT	TO	METR	0
40 10 10 10 10 10 10 10 10 10 10 10 10 10					-
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GLS INC			117		
HARTFORD OIL CO.			116		
ARMCO INC			115		
OWENS CORNING FIBERGLASS			114		
STREFLING OIL			114		
BRUCE MILLER CO.			113		
DUELL FUEL COMPANY			112		
L. F. LETTS & SONS			11:		
CAR TECH			11:		
JOHN TRUCKING			11:		
KUHN BROTHERS INC.			110		
MACK TRUCK			110		
LEE OIL CO			10		
ATLANTIC OIL & HEATING			10:		
CC			10		
PANASOTE			10	_	
STANDARD STEEL			10		
CHEMICAL LEAMAN TANK LINES			9	-	
RINGER PETROL			9		
INDUSTRIAL STEEL			9	-	
PATTERSON MOTOR OIL			9	_	
S. B. COLLINS			9	-	
CLEMENTS SUPPLY			9		
DAVEY COMPANY			9		
U.G.L.			9	_	
FITZGERALD TRANS			9	-	
GREEN BUS LINES			9	-	
VAN SANT EQUIP.			9	_	
JOHNSON OIL CO.			9		
TROUTMAN OIL SERV.			9	1	
KOPPERS CO. INC.			9	0	
CONTAINER CORP. OF AMERICA			8	5	
CLARKS PETROLEUM			8	5	
HOLLIDAY & JONES			8	5	
ALGER OIL			8	5	
HEFFNES BRAS CO			8	4	
S. C. SHORTLIDGE			8	4	
THE NESTLE CO.			8	3	
ATLANTIC RICHFIELD CO.			8	3.	
HOTLER INC.			8	3	
SOHIO ROADWAY			8	3	
N. S. ZINC CO.			8	3	
V.G.I.				2	
SCHUBERT INC.				2	
DA110 DA110 1			_	-	

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#### METRO CONTAINER

COMPANY NAME	DRUMS SENT TO METRO
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THE PROMETORS TO THE PROMETRIST	
INTERNATIONAL TERMINAL P P & LIGHT	81
C. C. GOODLING & SON	81
EDISON PRODUCTS	81
Q PETROL	80 * 80
MAUGER SIMPSON	80
ACE AUTO	80
PETROLEUM SERVICE CO.	79
GRAVE MFG. CO. INC.	, 5 79
L. R. WATERS	78
MARCAL PAPER	77
SERVICE OIL CO. INC.	77
VAROUGH OIL	76
KELLER OIL COMPANY	76
GREGORY OIL CO.	76
SUN TRANSPORT INC.	75
FLINCHBOUGH PRODUCTS	75
PEPPELMAN OIL CO.	74
IDEAL CORP	74
PIKE HEATING OIL	73.
KILGER & SONS INC	73
HIGHHOUSE OIL CO.	72
G L S INC	72
BECHTEL INC.	72
GENERAL TIRE & RUBBER CO.	7 <b>1</b>
AMERICAN CAN CO.	70
NEAPCO PRODUCTS INC.	69
ENRIGHT OIL	68
NEVILLE ISLAND TERMINAL	68
FILGER CO.	68
CRESENT INDUSTRIES INC.	66
S. LEASE WARNER	65
INGERSOLL RAND EQUIPMENT CORP.	65
O'SULLIVAN CORPORATION	64
ARLINGTON SCHOOL BOARD	6 <b>4</b> 6 <b>4</b>
HUTTER INC.	
DREW CHEMICAL	64 64
NEW YORK BUS COMPANY	
HOEGANES	6 <b>4</b> 62
SOUTHWORK COOPERAGE	62
W. C. SALES INC.	61
INLAND TERMINAL	61
BALTIMORE GAS & ELECTRIC	<del>-</del>
SILBERLINE MFG CO INC	60

COMPANY NAME	DRUMS SENT TO METRO
## ## ## ## ## ## ## ## ## ## ## ## ##	***************************************
HOORMAN INDUSTRIES INC.	60
NESTFALL	60
AMERICAN BILTRITE INC	58
AMERICAN DREDGING	58
US STEEL DIVISION (GM)	57
LESTER M. PRANGE CO.	56
TWA JFK AIRPORT	56
BOULDEN INC.	55
ALGER CO.	55
ADAMS OIL CO.	55
ARCO 4500	55
HUTLER INC.	55
L. K. MCKENZIE	53
COLGATE PALMOLIVE CO.	53
MAUGILL CO INC.	53
BROWNING OIL	51
HOFFMAN LAROCHE	51
WMATA	50
TREULS OIL	50
W.M. HOOPER & SONS, CO.	50
ACE SUPPLY	49
SOLAR COMPOUND COMPANY	49
HERBERT INBT INC.	49
AUTO SERVICE INC	48
KOHN BROTHERS	40
WESTINGHOUSE ELECTRIC CO.	46
GENERAL ELECTRIC CO.	46
ROBERT M. HARPER & SONS	4 6 4 5
NEW JERSEY ALUMINUM	45 45
H. E. GROFF	45
COPLAY CEMENT	45
SIX PAINTERS	44
SPS TECHNOLOGIES	44
GENERAL CRUSHED STONE WILKINSON INDUSTRIES	43
BROWING OIL CO.	40 39
MASONITE CORP.	39
LANDIS TOOL CO.	39 39
BEINER BROS.	38
J. E. BAKER CO.	
BILGER & SONS INC.	37 3 <i>5</i>
REIMER BROTHERS	36 35
SLF TRANSFERER	35 2 =
P.S.C.	35

#### ** DRAFT **

METRO CONTAINER
PRPs IN ORDER OF DRUMS CONTRIBUTED (1985, 1986, AND 1987)

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COMPANY NAME DRUMS SENT TO METRO _____ H. J. TANNER INC. 33 RHODES DRUMS 33 OKLAHOMA OIL CO. 33 A. P. A. TRANSPORT 32 MABRAK LINE 32 COORDINATED TRANSPORT INC. 32 E.C. BARNES, INC 32 SUPERIOR CARRIERS 31 MC 31 DAVIDSON STORE CO 30 DUNMORE OIL CO. 30 CATAWISSA VALVE 30 GREAT LAKES DREDGE 30 W. BUNTING & SON 29 ALIROEL 29 V.C. GOODLING & SON 29 COUNTRY AUTOMOTIVE 28 WACRER COMPANY 28 ELCO & HAUSMAN CONSTRUCTION 27 SMITH OIL CO. 27 SUFFOLK CHEMICAL 27 F. GAILEY 27 AIR DELIVERY SERVICE 26 S. BUNTING & SONS 26 MAIDEN CREEK FARM SUPPLY 26 FOGLIA 26 RHODES 25 PETROLEUM PRODUCTS CORP. 25 WEEKS ENGINEERING 25 UNITED OIL & BELTING 24 PA. METALLURGICAL INC. 24 CARL BICKER INC. 24 RED'S OF JEFFERY INC. 24 FULLER COMPANY 23 PAUL ORKIN T/A PAULS CHEVY 23 MERCH AND CO. INC. 23 NORMAN BRIGHT INC. 22 FERMSTONE OIL CO. 22 GREAT SOUTHERN 21 REINER OIL 21 ULTRA POWER 21 PRECISION COMPONENTS CORP. 21 READING COMM 20

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#### METRO CONTAINER

COMPANY NAME	SENT		METRO
REESE CANDY CO.		20	
GLIDDEN SCM.		2	
MOLECULAR CHEMICAL ESSEX CHEMICALS		20	
CLOVER DAIRY FARMS		20	
GEO SCHLICHE SON		2	
TOPPER PETROLEUM		ī	
KEYSTONE PAVING		1	9
WYETH LAB.		1	9
HARRY MILLER		1	
C. E. WILLIAMS & SONS		1	
H. S. BUNTING INC.		1	
ATERBERT IMBT INC PHILA. TBA CENTER		1	
AIRCO INDUSTRIAL GASES		1	
CAPITAL SERVICES		1	
PAUL H. KURTZ		1	
POLT BUS SERVICE		ī	
T.R.M. INC.		ī	
OIL HEAT & BURNER		1	7
KELLY		1	7
OWENS ILLINOIS INC.		1	
TELEGRAPH PRESS		1	
METROPOLITAN CORACM		1	
GEMSTAR STONES CO.		1	
QUICK SERVICE TAXI		1	
BENDIX PLASTICS LLOYD J. NOLAN FUEL		1	
WOODSTREAM CORP		î	
CARSON LINE CO		ī	
PETROL PLUS		ī	
ALLENTOWN CEMENT CO.		1	5
HEYCO MOTELS, INC.		1	5
TOLINO-FUEL SERVICE			5
ATLAS TRUCK RENTAL		1	
THE DAVEN CO.			4
GEORGE H. BLOUGH			4
MAXI MFG.			4
INLAND CONTAINER CORP.			4
NATIONAL ROLLING MILLS INC.			4
AGGREGATES INC			. <b>4</b>
NORTH TRANSFER SICO CO.			.4
VOIT HYDRO INC.			.3
AATT NITOWA TWA.		4	· <del>-</del>

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#### METRO CONTAINER

COMPANY NAME	DRUMS SENT TO METRO
TO 00 00 00 00 00 00 00 00 00 00 00 00 00	
YORK OIL SERVICE	13
TRANSPORTATION SUPPLIES INC.	13
APPLETON PAPERS	13
A. M. P. INC.	13
POLORON PRODUCTS	13
M & M MARS	13
BAKER & RUSSELL INC.	13
F & W AUTO PARTS	13
A. P. A. LEASING	12
ZIEGLER CHEMICAL	12
CALL CHROMYCAL	12
WEIER NC	12
LEASEWAY PURCHASING CORP	12
PITT APPLIED RESEARCH	12
SUPERIOR BUILDING	12
LEATZ MILLING CO.	11
SMITH BROTHERS	11
PALMYRA INDUSTRIES	11
U.S. POST OFFICE	11
TULLEY CHEMICAL	îî
SKF INDUSTRY	11
MITCHELL TIRE	ii
JET BLAST	10
LEASE WARNER	10
L F TAYLOR INC	10
WOODLAWN OIL	10
GEARS BECK ENTERPRISE	10
J W WHITE TRUCK CENTER	10
STIFF OIL CO.	10
R C A	10
EASTERN FREEZE CO.	10
ROADWAY EXPRESS CORP.	10
RALPH BRASHER	10
RYDER TRUCK RENTAL	10
WASHINGTON T.B.A. CENTER	10
TAYLOR PACKING CO	10
PLANT #2	9
NEWMAN CO.	9
JAMES RIVER & DIXIE NORTHERN	9
EAST COAST RAILROAD	9
THEODORE PANACCION	9
WASNICKS-AUTO SUPPLY	9
	9
SENICK INC	9
LOOMIS ARMORED INC.	

COMPANY NAME	DRUMS SENT TO METRO
	_
GEL'O'S ARCO	9
DOMINIC ZANNI	9
HALSEY, INC.	9
G. W. BOLLMAN CO.	8
WILLIAM CARSEN DRUG PLASTICS	8 8
	8
BORG-WARNER CORP. ST. JOHNSON	8
HESS OIL	8
ALLEN HYDRO INC.	8
W. G. ZIMMERMAN	8
PAUL T. MARONE	8
D & R SUPPLY	8
POTAMOR EDISON CO.	7
TONY CORP.	7
STEGMAN SERVICES	7
LANSDALE TRANS	7
TREMONT OIL	7
T. IDOLTZWORTH	7
PRECISION ROLL GRINDERS	7.
BEAR GAP STONE INC.	7
BITUMINOUS SERVICE	7
VYMCAL	7
HARRISSON EAST	7
HOUCK MFG. CO.	6
REEVES HOFFMAN	6
RAYMOND NIMEY	6
NORTON PETROLEUM	<b>6</b>
LUBECO INC.	6
BUILDERS EXPRESS	6
PAULSEN WIRE ROPE CO.	6
BALL UNIMARK PLASTICS	6
PHILA BETH & HERR	6
P M HARPER	6
GREENSBORO SUPPLY	6
BOWERS CO.	6
HERTZ CORP	6
NORTH PENN TRANS	6
BLOOMFIELD FARM	6
LAKE CHAMPLAIN COAL CO.	6
TOWER SALES INC.	6
TRW CO.	6
U.S. GYPSUM CO.	6
SHERWOOD B.	6

		.*	
COMPANY NAME	DRUMS	SENT	TO METRO
YORK DRILLING CO. INC.			5
A. ULRICH			5
ACCURATE SCREWING			5
WHITCHALL CEMENT			5
WEISS MARKETS INC.			5
BOB RHONE			
			5
BORO OF CHAMBERSBURG			5
PUREX CORP.			5
BRIDON AMERICAN CORP.			5
COCA COLA			5
CRAMCO OIL			5
PORT BUS SERVICE			5
E. E. KOUCH & SONS			5
A. SULLIVAN CORP.			5
POH-BAS SERVICE			5
EICKELBERGER WELL DRILL, INC.			5
HONEYWELL TRANSFER			5
STATE LIVE OIL			5
FAIRCHILD WESTON			5
TOOL SALES SERVICES			5
HARDESTY & MONROE			5
M. CLAUSERINGS			5
GLASCOW			5
HOPPERS CO.			5
I.R.I.			5
			5
MUNCY MACHINE & TOOL			
MONGAN CK			5
JOE SEAGRAM			5
PARTS ELEVATOR			4
SCLEK OPTICAL			4
PACKAGING CORP OF AMERICA			4
SALES			4
YOST M KUNTZ INC			4
FRANCIS SMITH & SONS			4
WILSON FORGING			4
			-
WHITEHALL CEMENT			4
BAKER INDUSTRIES			4
U.P.S.			4
CHAMPION VALLEY			4
SUBURBAN PROPANE			4
C H MASLAND			4
EQT			4
DESOUSA OIL SERVICE			Ā
			4
BRISTOL STEEL			4

CONTINENTAL CAN CO.  VALLEY FORGE FLAG CO.  SULLIVAN CORP.  JAUNTY FABRICS CORP.  J DONAHUE  LIG CARBONIC CORP  INDEPENDENT CORRUGATED  MAGIC MARKAS  KAUFMAN MINTEER  KAWECK-BERYLCI  JETRICK MILK PROD  G.O.E. INC.  ROBERT ROYER  HERTZ PENSKI  JUPPER MERION  DAVIS PRECISION  POLOSEN PRODUCT  WORLD TRANSMISSION  ADDOCAK SERVICE  PHILADELPHIA BETH. HERB  HEATHCOTE LAWN  ALLIED CHEMICAL  PARAYA INDUSTRIES  ALMORT INC.  GERRALD SCHOCLLEPA  COMMUNITY AUTO  ESSCLEM CO.  GENERAL MACHINE  PENNWALT CORP.  R.E. ENERRY  J MARCH MACHINE  PENNWALT CORP.  R.E. ENERRY  J MARCH MACHINE  J SAGE OVERHAUL  ARTHUR ULRICH  MARCH MACHINERY  J GENERAL BELVATOR  GENERAL BELVATOR  GENERAL BELVATOR  GENERAL BELVATOR  J GENERAL BELVATOR  GENERAL LELVATOR
VALLEY FORGE FLAG CO.  SULLIVAN CORP.  3 JAUNTY FABRICS CORP.  J DONAHUE  LIG CARBONIC CORP  3 INDEPENDENT CORRUGATED  MAGIC MARKAS  KAUFMAN MINTER  KAWECK-BERYLCI  3 JETRICK MILK PROD  G.O.E. INC.  ROBERT ROYER  HERTZ PENSKI  UPPER MERION  DAVIS PRECISION  POLOSEN PRODUCT  WORLD TRANSMISSION  ADOCAK SERVICE  PHILADELPHIA BETH. HERB  HEATHCOTE LAWN  ALLIED CHEMICAL  PARAYA INDUSTRIES  ALMORT INC.  GERALD SCHOCLLEPA  COMMUNITY AUTO  GSSCLEM CO.  GENERAL MACHINE  PENNWALT CORP.  R.E. ENERRY  D.M.E. CO.  SAGE OVERHAUL  ARTHUR ULRICH  BETTY FORNED METALS  WARD MACHINERY CO.  W. SCHUAB  GENERAL LELVATOR  GENERAL LELVATOR  GENERAL LELVATOR  GENERAL LELVATOR  GENERAL LELVATOR  GENERAL LELVATOR  GENERAL PRODUCTS  2
VALLEY FORGE FLAG CO.  SULLIVAN CORP.  3 JAUNTY FABRICS CORP.  J DONAHUE  LIG CARBONIC CORP  3 INDEPENDENT CORRUGATED  MAGIC MARKAS  KAUFMAN MINTER  KAWECK-BERYLCI  3 JETRICK MILK PROD  G.O.E. INC.  ROBERT ROYER  HERTZ PENSKI  UPPER MERION  DAVIS PRECISION  POLOSEN PRODUCT  WORLD TRANSMISSION  ADOCAK SERVICE  PHILADELPHIA BETH. HERB  HEATHCOTE LAWN  ALLIED CHEMICAL  PARAYA INDUSTRIES  ALMORT INC.  GERALD SCHOCLLEPA  COMMUNITY AUTO  GSSCLEM CO.  GENERAL MACHINE  PENNWALT CORP.  R.E. ENERRY  D.M.E. CO.  SAGE OVERHAUL  ARTHUR ULRICH  BETTY FORNED METALS  WARD MACHINERY CO.  W. SCHUAB  GENERAL LELVATOR  GENERAL LELVATOR  GENERAL LELVATOR  GENERAL LELVATOR  GENERAL LELVATOR  GENERAL LELVATOR  GENERAL PRODUCTS  2
JAUNTY FABRICS CORP.  J DONAHUE  J DONAHUE  LIG CARBONIC CORP  INDEPENDENT CORUGATED  MAGIC MARKAS  KAUFMAN MINTEER  KAWECK-BERYLCI  JETRICK MILK PROD  G.O.E. INC.  ROBERT ROYER  HERTZ PENSKI  UPPER MERION  DAVIS PRECISION  POLOSEN PRODUCT  WORLD TRANSMISSION  ADOOCAK SERVICE  PHILADELPHIA BETH. HERB  HEATHCOTE LAWN  ALLIED CHEMICAL  PARAYA INDUSTRIES  ALMORT INC.  GERALD SCHOCLLEPA  COMMUNITY AUTO  ESSCLEM CO  GENERAL MACHINE  D.M.E. CO.  SAGE OVERHAUL  ARTHUR ULRICH  BETTY FORNED METALS  WARD MACHINERY CO.  W. SCHUAB  GENERAL ELEVATOR  GENERAL ELEVATOR  GENERAL ELEVATOR  GENERAL ELEVATOR  GENERAL ELEVATOR  GENERAL ELEVATOR  GETE PRODUCTS
JAUNTY FABRICS CORP. J DONAHUE J DONAHUE J CARBONIC CORP J STROMED STREET STREE
LIG CARBONIC CORP INDEPENDENT CORRUGATED  MAGIC MARKAS  KAUFMAN MINTEER  KAWECK-BERYLCI  DIETRICK MILK PROD  G.O.E. INC.  ROBERT ROYER  HERTZ PENSKI  UPPER MERION  DAVIS PRECISION  POLOSEN PRODUCT  WORLD TRANSMISSION  ADOCAK SERVICE  PHILADELPHIA BETH. HERB  HEATHCOTE LAWN  ALLIED CHEMICAL  PARAYA INDUSTRIES  ALMORT INC.  GERALD SCHOCLLEPA  COMMUNITY AUTO  ESSCLEM CO  GENERAL MACHINE  PENNWALT CORP.  R.E. ENERRY  D.M.E. CO.  SAGE OVERHAUL  ARTHUR ULRICH  BETTY FORNED METALS  WARD MACHINERY CO.  W. SCHUAB  GENERAL ELEVATOR  2  GTE PRODUCTS
INDEPENDENT CORRUGATED  MAGIC MARKAS  KAUFMAN MINTEER  KAWECK-BERYLCI  DIETRICK MILK PROD  G.O.E. INC.  ROBERT ROYER  HERTZ PENSKI  UPPER MERION  DAVIS PRECISION  OALOSEN PRODUCT  WORLD TRANSMISSION  ADOCAK SERVICE  PHILADELPHIA BETH. HERB  3 HEATHCOTE LAWN  ALLIED CHEMICAL  PARAYA INDUSTRIES  ALMORT INC.  GERALD SCHOCLLEPA  COMMUNITY AUTO  ESSCLEM CO  GENERAL MACHINE  PENNWALT CORP.  R.E. ENERRY  D.M.E. CO.  SAGE OVERHAUL  ARTHUR ULRICH  BETTY FORNED METALS  WARD MACHINERY CO.  W. SCHUAB  GENERAL ELEVATOR  GETE PRODUCTS
MAGIC MARKAS  KAUFMAN MINTEER  KAWECK-BERYLCI  DIETRICK MILK PROD  G.O.E. INC.  ROBERT ROYER  HERTZ PENSKI  UPPER MERION  DAVIS PRECISION  POLOSEN PRODUCT  WORLD TRANSMISSION  ADOOCAK SERVICE  PHILADELPHIA BETH. HERB  HEATHCOTE LAWN  ALLIED CHEMICAL  PARAYA INDUSTRIES  ALMORT INC.  GERALD SCHOCLLEPA  COMMUNITY AUTO  ESSCLEM CO.  GENERAL MACHINE  PENNWALT CORP.  R.E. ENERRY  D.M.E. CO.  SAGE OVERHAUL  ARTHUR ULRICH  BETTY FORNED METALS  WARD MACHINERY CO.  W. SCHUAB  GENERAL ELEVATOR
KAWEMAN MINTEER       3         KAWECK-BERYLCI       3         DIETRICK MILK PROD       3         G.O.E. INC.       3         ROBERT ROYER       3         HERTZ PENSKI       3         UPPER MERION       3         DAVIS PRECISION       3         POLOSEN PRODUCT       3         WORLD TRANSMISSION       3         ADOOCAK SERVICE       3         PHILADELPHIA BETH. HERB       3         HEATHCOTE LAWN       3         ALLIED CHEMICAL       3         PARAYA INDUSTRIES       3         ALMORT INC.       3         GERALD SCHOCLLEPA       3         COMMUNITY AUTO       3         ESSCLEM CO.       3         GENERAL MACHINE       3         PENNWALT CORP.       3         R.E. ENERRY       3         D.M.E. CO.       3         SAGE OVERHAUL       3         ARTHUR ULRICH       3         BETTY FORNED METALS       3         W. SCHUAB       3         GENERAL ELEVATOR       2         GTE PRODUCTS       2
KAWECK-BERYLCI       3         DIETRICK MILK PROD       3         G.O.E. INC.       3         ROBERT ROYER       3         HERTZ PENSKI       3         UPPER MERION       3         DAVIS PRECISION       3         POLOSEN PRODUCT       3         WORLD TRANSMISSION       3         ADOOCAK SERVICE       3         PHILADELPHIA BETH. HERB       3         HEATHCOTE LAWN       3         ALLIED CHEMICAL       3         PARAYA INDUSTRIES       3         ALMORT INC.       3         GERALD SCHOCLLEPA       3         COMMUNITY AUTO       3         ESSCLEM CO.       3         GENERAL MACHINE       3         PENNWALT CORP.       3         R.E. ENERRY       3         D.M.E. CO.       3         SAGE OVERHAUL       3         ARTHUR ULRICH       3         BETTY FORNED METALS       3         WARD MACHINERY CO.       3         W. SCHUBA       3         GENERAL ELEVATOR       2         GTE PRODUCTS       2
DIETRICK MILK PROD  G.O.E. INC.  GO.E. INC.  ROBERT ROYER  3 HERTZ PENSKI  UPPER MERION  DAVIS PRECISION  POLOSEN PRODUCT  WORLD TRANSMISSION  ADOOCAK SERVICE  PHILADELPHIA BETH. HERB  HEATHCOTE LAWN  ALLIED CHEMICAL  PARAYA INDUSTRIES  ALMORT INC.  GERALD SCHOCLLEPA  COMMUNITY AUTO  ESSCLEM CO  GENERAL MACHINE  PENNWALT CORP.  R.E. ENERRY  D.M.E. CO.  SAGE OVERHAUL  ARTHUR ULRICH  BETTY FORNED METALS  WAS CHUAB  GENERAL ELEVATOR  GENERAL ELEVATOR  GENERAL ELEVATOR  GENERAL ELEVATOR  GENERAL ELEVATOR  3  GENERAL SCHUAB  GENERAL ELEVATOR  3  GENERAL ELEVATOR  2  GTE PRODUCTS
G.O.E. INC.  ROBERT ROYER  HERTZ PENSKI  UPPER MERION  DAVIS PRECISION  POLOSEN PRODUCT  WORLD TRANSMISSION  ADOOCAK SERVICE  PHILADELPHIA BETH. HERB  HEATHCOTE LAWN  ALLIED CHEMICAL  PARAYA INDUSTRIES  ALMORT INC.  GERALD SCHOCLLEPA  COMMUNITY AUTO  ESSCLEM CO  GENERAL MACHINE  PENNWALT CORP.  R.E. ENERRY  D.M.E. CO.  SAGE OVERHAUL  ARTHUR ULRICH  BETTY FORNED METALS  WARD MACHINERY CO.  GENERAL ELEVATOR  GET PRODUCTS
ROBERT ROYER       3         HERTZ PENSKI       3         UPPER MERION       3         DAVIS PRECISION       3         POLOSEN PRODUCT       3         WORLD TRANSMISSION       3         ADOOCAK SERVICE       3         PHILADELPHIA BETH. HERB       3         HEATHCOTE LAWN       3         ALLIED CHEMICAL       3         PARAYA INDUSTRIES       3         ALMORT INC.       3         GERALD SCHOCLLEPA       3         COMMUNITY AUTO       3         ESSCLEM CO       3         GENERAL MACHINE       3         PENNWALT CORP.       3         R.E. ENERRY       3         D.M.E. CO.       3         SAGE OVERHAUL       3         ARTHUR ULRICH       3         BETTY FORNED METALS       3         WARD MACHINERY CO.       3         W. SCHUAB       3         GENERAL ELEVATOR       2         GTE PRODUCTS       2
HERTZ PENSKI  UPPER MERION  DAVIS PRECISION  POLOSEN PRODUCT  WORLD TRANSMISSION  ADOOCAK SERVICE  PHILADELPHIA BETH. HERB  HEATHCOTE LAWN  ALLIED CHEMICAL  PARAYA INDUSTRIES  ALMORT INC.  GERALD SCHOCLLEPA  COMMUNITY AUTO  ESSCLEM CO  GENERAL MACHINE  PENNWALT CORP.  R.E. ENERRY  D.M.E. CO.  SAGE OVERHAUL  ARTHUR ULRICH  BETTY FORNED METALS  WARD MACHINERY CO.  GENERAL ELEVATOR  GENERAL ELEVATOR  GENERAL ELEVATOR  GENERAL ELEVATOR  GENERAL BEROUCTS  3  3  3  4  3  4  5  5  6  6  6  7  7  8  7  8  7  8  8  8  8  9  9  9  9  9  9  9  9  9
UPPER MERION 3 DAVIS PRECISION 3 POLOSEN PRODUCT 3 WORLD TRANSMISSION 3 ADOOCAK SERVICE 3 PHILADELPHIA BETH. HERB 3 HEATHCOTE LAWN 3 ALLIED CHEMICAL 3 PARAYA INDUSTRIES 3 ALMORT INC. 3 GERALD SCHOCLLEPA 3 COMMUNITY AUTO 3 ESSCLEM CO 3 GENERAL MACHINE 3 PENNWALT CORP. 3 R.E. ENERRY 3 D.M.E. CO. 3 SAGE OVERHAUL 3 ARTHUR ULRICH 3 BETTY FORNED METALS 3 WARD MACHINERY CO. 3 W. SCHUAB 3 GENERAL ELEVATOR 2 GTE PRODUCTS 2
DAVIS PRECISION POLOSEN PRODUCT WORLD TRANSMISSION ADOOCAK SERVICE PHILADELPHIA BETH. HERB HEATHCOTE LAWN ALLIED CHEMICAL PARAYA INDUSTRIES ALMORT INC. GERALD SCHOCLLEPA COMMUNITY AUTO SSCLEM CO GENERAL MACHINE PENNWALT CORP. R.E. ENERRY D.M.E. CO. SAGE OVERHAUL ARTHUR ULRICH BETTY FORNED METALS WARD MACHINERY CO. W. SCHUAB GENERAL ELEVATOR GENERAL ELEVATOR GENERAL ELEVATOR GENERAL SCHOOLLEPA GENERAL ELEVATOR GENERAL SCHOOL GENERAL ELEVATOR GENERAL ELEVATOR GENERAL ELEVATOR GENERAL SCHOOL GENERAL ELEVATOR GENERAL ELEVATOR GENERAL SCHOOL GENERAL GLEVATOR GENERAL GEN
POLOSEN PRODUCT       3         WORLD TRANSMISSION       3         ADOOCAK SERVICE       3         PHILADELPHIA BETH. HERB       3         HEATHCOTE LAWN       3         ALLIED CHEMICAL       3         PARAYA INDUSTRIES       3         ALMORT INC.       3         GERALD SCHOCLLEPA       3         COMMUNITY AUTO       3         ESSCLEM CO       3         GENERAL MACHINE       3         PENNWALT CORP.       3         R.E. ENERRY       3         D.M.E. CO.       3         SAGE OVERHAUL       3         ARTHUR ULRICH       3         BETTY FORNED METALS       3         WARD MACHINERY CO.       3         W. SCHUAB       3         GENERAL ELEVATOR       2         GTE PRODUCTS       2
WORLD TRANSMISSION       3         ADOOCAK SERVICE       3         PHILADELPHIA BETH. HERB       3         HEATHCOTE LAWN       3         ALLIED CHEMICAL       3         PARAYA INDUSTRIES       3         ALMORT INC.       3         GERALD SCHOCLLEPA       3         COMMUNITY AUTO       3         ESSCLEM CO.       3         GENERAL MACHINE       3         PENNWALT CORP.       3         R.E. ENERRY       3         D.M.E. CO.       3         SAGE OVERHAUL       3         ARTHUR ULRICH       3         BETTY FORNED METALS       3         WARD MACHINERY CO.       3         W. SCHUAB       3         GENERAL ELEVATOR       2         GTE PRODUCTS       2
ADOOCAK SERVICE PHILADELPHIA BETH. HERB 3 HEATHCOTE LAWN 3 ALLIED CHEMICAL 3 PARAYA INDUSTRIES 3 ALMORT INC. 3 GERALD SCHOCLLEPA 5 COMMUNITY AUTO 3 ESSCLEM CO 3 GENERAL MACHINE 3 PENNWALT CORP. 3 R.E. ENERRY 3 D.M.E. CO. 3 SAGE OVERHAUL 3 ARTHUR ULRICH 3 BETTY FORNED METALS WARD MACHINERY CO. 3 W. SCHUAB GENERAL ELEVATOR GTE PRODUCTS 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3
PHILADELPHIA BETH. HERB       3         HEATHCOTE LAWN       3         ALLIED CHEMICAL       3         PARAYA INDUSTRIES       3         ALMORT INC.       3         GERALD SCHOCLLEPA       3         COMMUNITY AUTO       3         ESSCLEM CO       3         GENERAL MACHINE       3         PENNWALT CORP.       3         R.E. ENERRY       3         D.M.E. CO.       3         SAGE OVERHAUL       3         ARTHUR ULRICH       3         BETTY FORNED METALS       3         WARD MACHINERY CO.       3         W. SCHUAB       3         GENERAL ELEVATOR       2         GTE PRODUCTS       2
## HEATHCOTE LAWN 3  ALLIED CHEMICAL 3  PARAYA INDUSTRIES 3  ALMORT INC. 3  GERALD SCHOCLLEPA 3  COMMUNITY AUTO 3  ESSCLEM CO 3  GENERAL MACHINE 3  PENNWALT CORP. 3  R.E. ENERRY 3  D.M.E. CO. 3  SAGE OVERHAUL 3  ARTHUR ULRICH 3  BETTY FORNED METALS 3  WARD MACHINERY CO. 3  W. SCHUAB 3  GENERAL ELEVATOR 2  GTE PRODUCTS 2
ALLIED CHEMICAL  PARAYA INDUSTRIES  ALMORT INC.  GERALD SCHOCLLEPA  COMMUNITY AUTO  ESSCLEM CO  GENERAL MACHINE  PENNWALT CORP.  R.E. ENERRY  D.M.E. CO.  SAGE OVERHAUL  ARTHUR ULRICH  BETTY FORNED METALS  WARD MACHINERY CO.  W. SCHUAB  GENERAL ELEVATOR  GTE PRODUCTS  3  3  3  3  3  3  3  3  4  5  6  6  7  7  7  7  7  7  7  7  7  7  7
PARAYA INDUSTRIES       3         ALMORT INC.       3         GERALD SCHOCLLEPA       3         COMMUNITY AUTO       3         ESSCLEM CO       3         GENERAL MACHINE       3         PENNWALT CORP.       3         R.E. ENERRY       3         D.M.E. CO.       3         SAGE OVERHAUL       3         ARTHUR ULRICH       3         BETTY FORNED METALS       3         WARD MACHINERY CO.       3         W. SCHUAB       3         GENERAL ELEVATOR       2         GTE PRODUCTS       2
ALMORT INC. 3 GERALD SCHOCLLEPA 3 COMMUNITY AUTO 3 ESSCLEM CO 3 GENERAL MACHINE 3 PENNWALT CORP. 3 R.E. ENERRY 3 D.M.E. CO. 3 SAGE OVERHAUL 3 ARTHUR ULRICH 3 BETTY FORNED METALS 3 WARD MACHINERY CO. 3 W. SCHUAB 3 GENERAL ELEVATOR 2 GTE PRODUCTS 2
GERALD SCHOCLLEPA       3         COMMUNITY AUTO       3         ESSCLEM CO       3         GENERAL MACHINE       3         PENNWALT CORP.       3         R.E. ENERRY       3         D.M.E. CO.       3         SAGE OVERHAUL       3         ARTHUR ULRICH       3         BETTY FORNED METALS       3         WARD MACHINERY CO.       3         W. SCHUAB       3         GENERAL ELEVATOR       2         GTE PRODUCTS       2
COMMUNITY AUTO       3         ESSCLEM CO       3         GENERAL MACHINE       3         PENNWALT CORP.       3         R.E. ENERRY       3         D.M.E. CO.       3         SAGE OVERHAUL       3         ARTHUR ULRICH       3         BETTY FORNED METALS       3         WARD MACHINERY CO.       3         W. SCHUAB       3         GENERAL ELEVATOR       2         GTE PRODUCTS       2
ESSCLEM CO       3         GENERAL MACHINE       3         PENNWALT CORP.       3         R.E. ENERRY       3         D.M.E. CO.       3         SAGE OVERHAUL       3         ARTHUR ULRICH       3         BETTY FORNED METALS       3         WARD MACHINERY CO.       3         W. SCHUAB       3         GENERAL ELEVATOR       2         GTE PRODUCTS       2
GENERAL MACHINE  PENNWALT CORP.  R.E. ENERRY  D.M.E. CO.  SAGE OVERHAUL  ARTHUR ULRICH  BETTY FORNED METALS  WARD MACHINERY CO.  W. SCHUAB  GENERAL ELEVATOR  GTE PRODUCTS  3  3  3  3  3  3  4  5  6  7  7  8  7  8  7  8  7  8  7  8  7  8  7  8  7  8  7  8  7  8  7  8  7  8  7  8  7  8  7  8  7  8  7  8  8
PENNWALT CORP. 3 R.E. ENERRY 3 D.M.E. CO. 3 SAGE OVERHAUL 3 ARTHUR ULRICH 3 BETTY FORNED METALS 3 WARD MACHINERY CO. 3 W. SCHUAB 3 GENERAL ELEVATOR 2 GTE PRODUCTS 2
R.E. ENERRY 3 D.M.E. CO. 3 SAGE OVERHAUL 3 ARTHUR ULRICH 3 BETTY FORNED METALS 3 WARD MACHINERY CO. 3 W. SCHUAB 3 GENERAL ELEVATOR 2 GTE PRODUCTS 2
D.M.E. CO. 3 SAGE OVERHAUL 3 ARTHUR ULRICH 3 BETTY FORNED METALS 3 WARD MACHINERY CO. 3 W. SCHUAB 3 GENERAL ELEVATOR 2 GTE PRODUCTS 2
SAGE OVERHAUL 3 ARTHUR ULRICH 3 BETTY FORNED METALS 3 WARD MACHINERY CO. 3 W. SCHUAB 3 GENERAL ELEVATOR 2 GTE PRODUCTS 2
ARTHUR ULRICH 3 BETTY FORNED METALS 3 WARD MACHINERY CO. 3 W. SCHUAB 3 GENERAL ELEVATOR 2 GTE PRODUCTS 2
BETTY FORNED METALS  WARD MACHINERY CO.  W. SCHUAB  GENERAL ELEVATOR  GTE PRODUCTS  3 3 3 4 3 5 6 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7
BETTY FORNED METALS  WARD MACHINERY CO.  W. SCHUAB  GENERAL ELEVATOR  GTE PRODUCTS  3 3 3 4 3 5 6 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7
W. SCHUAB 3 GENERAL ELEVATOR 2 GTE PRODUCTS 2
GENERAL ELEVATOR 2 GTE PRODUCTS 2
GENERAL ELEVATOR 2 GTE PRODUCTS 2
GTE PRODUCTS 2
OTTO-HOFFMAN SONS 2
PAUL MORETTO 2
PENNA BOX DIV. 2
THOMPSON CORP. 2
G.T.E. PRODUCTS CORP.
HERSHEY CHOCOLATE 2

** DRAFT **

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#### METRO CONTAINER

COMPANY NAME	DRUMS SENT TO METRO
මම අති මත සහ සහ සහ අතු අතු සහ සහ සහ සහ සහ සහ සහ	
METALLURGICAL PROC.	2
UNILED OIL	2
P.M.E. CO.	2
DEFAZIO EXPRESS	2
HICKLEYS AUTO EXP.	2
BALTIMORE AUTO	2
DAILY EXPRESS	2
M.S. REICHENBACK	2
LEBANON MACHINE	2
T. EPSTEIN AND SONS	2
YEASLEY SERVICE	
REYNOLDS METAL CORP.	2
AMES SUPPLY	2 2 2
WILGER & SON INC	2
AMPIN STEEL CAST	2
R. S. MASTERS	2
M S M SERVICE CO.	2
CARRIER AIR	2
R & L MACHIRE	2
KANCCH-BEIYLES	2
CONSTRUCTION SYSTEMS	2
PRESS ENTERPRISE	2
C A SPALDING CO	2
A. E. WALKER INC.	2
MASLAND CO.	2
M. COBLEN SONS	2
PROCTOR EXPRESS	ĺ
QANES ALLOY. CASTING CO	i
BAUSERMAN OIL CO	ī
U.S. AGRICULTURE CHEMICAL INC.	ī
PETES T/A DJW	ī
KEYSTONE SCREW	i
	i
CARMINZ-ZAPPARDINO	i
AVIS RENT-A-CAR	i
TURNMATIC INC	i
HOWARD ASAL	
POTTSVILLE BLEACH & DYING CO	1
ELECTRICAL MAINT	1
WILEY CORK CO	
BLACK & DECKER	1 1 1
BAY PROD	1
ERB BROTHERS	
TONY LEININGER	1
POMONS OIL CO.	1

#### ** DRAFT **

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METRO CONTAINER
PRPs IN ORDER OF DRUMS CONTRIBUTED (1985, 1986, AND 1987)

COMPANY NAME	DRUMS SENT TO METRO
	400 400 time film 400 400 400 400 400 400 400 400 400 40
GRAVE SILK CO	1
ACME MARKETS INC.	Ť
ACE BOTTLED GAS	ī
PAMMELL CO.	ī
THOMAS D. FREDERICK	1
STEIN -HENRY CORP.	1
B.A. BOWMAN	1
RMR CORP.	1
HELEN LAMB	1
UNION FUEL	1
INTELLIGENCER	1

## DRAFT

### METRO CONTAINER DRUM COUNT REPORT ****FINAL DRAFT****

Secondary RP	Tertiary RP	YEAR	TOTAL DRUMS
** PRIMARY RP: ONLY ** Subtotal **	AABCO STEEL DRUM, INC.	1987	
** PRIMARY RP: ONLY ONLY ONLY ** Subtotal **	AFCO	1986	4220 6155 5926 1101
	ALUMAX ALUMINUM CORPORATION	1985 1987	
** Subtotal **			2911
** PRIMARY RP: KELLY ** Subtotal **	AMERICAN DREDGING RHODES DRUMS	1985	17 17
** PRIMARY RP: ONLY SOHIO ROADWAY ONLY ONLY ** Subtotal **	B. P. OIL COMPANY	1985 1985 1986 1987	83 3768
** PRIMARY RP: ONLY ONLY ONLY ** Subtotal **	CALLAHAN CHEMICAL CO.	1985 1986 1987	2638 5226 3915
** PRIMARY RP: ONLY ** Subtotal **	CAPITAL LUBRICANTS	1986	2708 2708
** PRIMARY RP: ONLY	CARLOS R. LEFFLER INC.	1987	23

## DRAFI

# METRO CONTAINER DRUM COUNT REPORT ****ARCO PETROLEUM AND CHEMICAL**** FINAL DRAFT REPORT

Secondary RP		Tertiary RP	YEAR	TOTAL DRUMS
** PRIMARY RP: ONLY ONLY ONLY ** Subtotal **	ARCO CHEMICAI	co.	198 <b>5</b> 198 <b>6</b> 1987	839 1956 492
3455541				3287
ONLY A. C. & T. CO A. E. WALKER A. M. P. INC. ACCURATE SCRE ACE AUTO ACE BOTTLED G ACE SUPPLY ACME MARKETS ADAMS OIL CO. ALIROEL ALLERMAN ALMORT INC. ALTMAN DISTRI AMERICAN CAN ARCO 4500	. INC. INC. INC. WING LY CO. AS INC. BUTION CO. CO. M PRODUCTS E HEATING IES O CO RVICE RM O. EUM LY FARMS P. OF AMERI	HERR'S MOTOR EXPRESS	198555555555555555555555555555555555555	2134 217 15 80 2601 491 555 2463 545 10 21 399 1656 453 1697 5564 585 1697 1697 1697 1697 1697 1697 1697 1697

COMPANY NAME	DRUMS SENT TO METRO
MOBIL OIL COMPANY	230,493
CHEVRON	64,713
B. P. OIL COMPANY	29,428
E. I. DUPONT	23,265
FRITCH FUEL CO.	21,216
ARCO PETROLEUM PRODUCTS CO.	15,891
REX OIL CO.	15,271
SUN OIL CO.	14,096
AFCO	13,182
HOUFF TRANSFER CO. CALLAHAN CHEMICAL CO.	12,63 <b>2</b> 11,779
JAY GRESS INCORPORATED	8,867
GULF OIL	8,735
NATIONAL SOLVENT	7,565
WHITE OIL CO.	6,736
KAISER ALUMINUM & CHEMICAL CORP.	5,590
LANEY OIL CO. INC.	5,543
J. B. HUNT TRANSPORT CO. INC.	5,031
SUPERIOR	4,622
AABCO STEEL DRUM, INC.	4,317
MARINE LAUNCH	3,589
OCCIDENTAL CHEM & PLASTICS	3,525
PETROLEUM	3,427
CARLOS R. LEFFLER INC.	3,295
ARCO CHEMICAL CO.	3,287
JTM DRUM	3,220
ALUMAX ALUMINUM CORPORATION	3,126 2,708
CAPITAL LUBRICANTS E. J. KOENIG	2,708
S. W. RAWLS INC.	2,300
CONESTOGA FUEL	2,114
FISHER BODY - DIVISION OF GENERAL MOTOR	
HERR'S MOTOR EXPRESS	1,995
D & B EXPRESS	1,963
PHOTO & ELECTRIC	1,963
SCHUCHART INC.	1,868
HOOKER & HOLLOWELL OIL CO.	1,834
MOORE BROS. OIL CO.	1,794
INDUSTRIAL SOLVENTS & CHEM. CO.	1,733 _e
ACME INC.	1,550
SAVANNAH OIL & CHEMICAL	1,448
K. SALES INC.	1,390
SOUTHERN LUBRICANTS	1,377
ILLEGIBLE	1,359

COMPANY NAME	DRUMS	SENT	TO	METRO
~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~				
ROOT OIL CO.			413	3
LOCKER OIL CO.			405	5
KESSLER CHEMICAL			395	5
MANASSAS ICE & FUEL			385	5
FISHER GUIDE			373	3
GB HOOBER & SONS			364	
PHILADELPHIA GEAR CORP.			362	2
PEDRONI FUEL CO.			346	5
EASTERN INDUSTRIES			340	כ
STAR OIL			324	<b>.</b>
SCHULTZ LUBRICANTS			32:	
VALLEY PETROLEUM INC.			319	
PEOPLES GAS & OIL			30:	
FIRST STATE STEEL DRUM CO.			297	
DON P. MEISTER			29:	
STOCKMAN OIL			288	
STROH BREWERY CO.			282	
STACKMAN OIL			282	
AUTOLINE LUBRICANTS			283	
AMERICAN KOYO			276	
TAYLOR			276	
ATLANTIC REFINING AND MARKETING			269	
DANIELSON OIL CO.			268	
PTL INTERNATIONAL			267	
OVERNITE TRANSPORTATION COMPANY			264	
C. L. MACK INC.			26:	
WILLIAM L. GIFT			258	-
MARIN OIL SERVICE			252	
HOUGHTON			250	
LIBERTY OIL CO.			248	
ALTMAN DISTRIBUTION CO.			240	_
DELMARVA POWER & LIGHT			24!	
FEGLEY OIL CO.			244	
PEOPLES OIL & GAS			234	
TAYLOR OIL CO.			23	
MATTHEWS BROS.			23	
HERCULES CORPORATION			23	
TEVIS OIL CO.			23	
EASTERN STEEL DRUM DIV.			22	
PHILA. ELECTRIC CO.			22	
TILLEY CHEMICAL CO.			22	-
ERIE PETROL			22	
GRUMMAN AEROSPACE			22	
MARK CAIN TRUCKING			22	4

COMPANY NAME DRUMS SENT TO	) WEIRO
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MD ASSOCIATES SILVER EAGLE 22	20
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U.S. METAL & REFINING	70
CONSUMER OIL CORP. 1	69
EGON OIL & SUPPLY 1	69
BILTMORE OIL CO 1	69
WESTFALL ACE DRUM CO. 1	68
	67
	66
	65
	65
	65
	64
CHABOT'S PETROL 1	63

COMPANY NAME	DRUMS SENT TO METRO
GLS INC	117
HARTFORD OIL CO.	116
ARMCO INC	115
OWENS CORNING FIBERGLASS	114
STREFLING OIL	114
BRUCE MILLER CO.	113
DUELL FUEL COMPANY	112
L. F. LETTS & SONS	111
CAR TECH	111
JOHN TRUCKING	111
KUHN BROTHERS INC.	110
MACK TRUCK	110
LEE OIL CO	109
ATLANTIC OIL & HEATING	102
CC	101
PANASOTE	101
STANDARD STEEL	100
CHEMICAL LEAMAN TANK LINES	99
RINGER PETROL	98
INDUSTRIAL STEEL	97
PATTERSON MOTOR OIL	96
S. B. COLLINS	96
CLEMENTS SUPPLY	96
DAVEY COMPANY	95
U.G.L.	94
FITZGERALD TRANS	94
GREEN BUS LINES	93
VAN SANT EQUIP.	92
JOHNSON OIL CO.	92
TROUTMAN OIL SERV.	91
KOPPERS CO. INC.	90
CONTAINER CORP. OF AMERICA	85
CLARKS PETROLEUM	85
HOLLIDAY & JONES	85
ALGER OIL	85
HEFFNES BRAS CO	84
S. C. SHORTLIDGE	84
THE NESTLE CO.	83
ATLANTIC RICHFIELD CO.	83
HOTLER INC.	83
SOHIO ROADWAY	83
N. S. ZINC CO.	83
V.G.I.	82
SCHUBERT INC.	82

LAW OFFICES OF

#### SAUL, EWING, REMICK & SAUL

COPY

3800 CENTRE SQUARE WEST

SS VALLEY STREAM PARKWAY
SUITE 330
JREAT VALLEY CORPORATE CENTER
MALVERN PA 19355
2151 251-5050

PLAZA 1000 SUITE 664 EVESHAM AND KRESSON ROADS VOORMEES NJ 08043 609, 424-0098 PHILADELPHIA PA 19102

215: 972-7777

CABLE ADDRESS BIDSAL TELECOPIER 215, 972-7725 TWX 83-4798 222 DELAWARE AVENUE P O BOX 1266 WILMINGTON DE 19899 3021 654-1413

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> TWENTY FIRST FLOOR 237 PARK AVENUE NEW YORK NY (00.7 2(2. SS) (3502

972-8663

March 8, 1989

DIAL DIRECT '215

4 L - 1

VIA FEDERAL EXPRESS & HAND DELIVERY

TO: Metro PRP Group

RE: Metro Container Transactional Database

Dear Members:

Enclosed please find, at long last, a portion of the transactional database prepared by EPA contractor Booz-Allen.

Sincerely,

William J. Cluck

/isd

cc: Carl B. Everett, Esquire

### PRELIMINARY DRAFT REPORT NUMBER TWO

# DRUMS SENT TO METRO CONTAINER BY SIX POTENTIALLY RESPONSIBLE PARTIES DURING THE YEARS 1985, 1986, AND 1987

3/4/89

PRP	<u> 1985</u>	Number of 1986	of Drums 1987	<u> 1985 - 1987</u>
Mobil Oil Co.	153,689	783	76,021	230,493
Sun Oil Co.	9,005	0	5,091	14,096
Chevron	9,127	18,387	37,199	64,713
B. P. Oil Co.	10,858	3,768	14,802	29,428
E. I. Dupont	3,373	2,219	17,673	23,265
ARCO	15,013	546	332	15,891
All Other Companies	125,804	32,840	101,302	259,946

Note: These figures are complete for named companies but very incomplete for "All Other Companies,"

#### SAUL, EWING, REMICK & SAUL

COPY

3800 CENTRE SQUARE WEST

SS VALLEY STREAM PARKWAY
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MALVERN PA (9355
(215) 251-5050

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(215) 972-7777

CABLE ADDRESS BIDSAL TELECOPIER (215) 972-7725 TWX 83-4798 222 DELAWARE AVENUE P. O. BOX 1266 WILMINGTON DE 19899 (302) 654-1413

1901 L STREET, N. W. SUITE 700 WASHINGTON, D.C. 20036 (202) 223-7660

TWENTY FIRST FLOOR 237 PARK AVENUE NEW YORK NY 10017 (212) 551-3502

RECEIVED

MAY 02 1989

DEBORAH P. FELT

DIAL DIRECT (215)

972-7171

May 30, 1989

Diane Ajl, Esquire U.S. Environmental Protection Agency Region III 841 Chestnut Building Philadelphia, PA 19107

Re: My Letter of May 26, 1989

Dear Diane:

As we discussed by telephone this morning, the referenced letter indicated that three drums marked "hydraulic oil" had appeared on site sometime between 7:00 p.m. on May 24 and 7:00 a.m. on May 25. Our contractor subsequently ascertained that those drums were probably left by Waste Conversion, who has performed emergency response work for EPA. My letter of May 26 also indicated that a small pile of drums had appeared at the site during the same timeframe. We subsequently were told by the guards that these drums had been delivered by Mr. Maslow within the last few weeks. The penultimate paragraph of the referenced letter failed to indicate that the source of the information regarding Maslow's new operations was the guard service. Apparently, Mr. Maslow and Globe Security Systems Co. have enjoyed a long relationship.

We remain concerned about the possible loss of valuable information related to PRPs and site operations generally.

Your interest in this matter is appreciated.

Sincerely,

Carí B. Everett

CBE/mml

cc: Metro PRP Group

Ms. Karen Wolper bcc: Mr. Bob Novak

LAW OFFICES OF

#### SAUL, EWING, REMICK & SAUL

3800 CENTRE SQUARE WEST

55 VALLEY STREAM PARKWAY
SUITE 330
GREAT VALLEY CORPORATE CENTER
MALVERN PA 19355

(215) 251-5050

PLAZA 1000 SUITE 664 EVESHAM AND KRESSON ROADS VOORHEES NJ 08043 (609) 424-0098 PHILADELPHIA PA 19102

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CABLE ADDRESS: BIDSAL TELECOPIER (215) 972-7725 TWX 83-4798 222 DELAWARE AVENUE P. O. BOX 1266 WILMINGTON DE 19899 (302) 654-1413

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TWENTY-FIRST FLOOR 237 PARK AVENUE NEW YORK NY 10017 (212) 551-3502

DIAL DIRECT (215)

972-7171

May 26, 1989

Mr. Bob Novak

Re: Metro Container Site

Dear Bob:

We are in agreement with the items set forth in your May 25 letter except that work on the personnel gate, concrete decon pad and drum staging pads, eating area, junk steel disposal, and UST tank testing should await finalization of the contract. We agree that these tasks are appropriate.

In response to those items for which guidance was sought (1) it is my understanding that the semi-trailer vans are not worth using, (2) we are looking into vehicle disposition, and (3) as we discussed, M-K is authorized to make arrangement for changing locks and I shall handle payment of the locksmith.

Thank you for your assistance.

Sincerely,

Carl B. Everett

CBE/mml

cc: Metro PRP Group



MORRISON-KNUDSEN PLAZA P.O. BOX 79/BOISE, IDAMO U.S.A. 83707 PHONE: (208) 386-5000/TELEX: 368439 FAX. (208) 386-6658/6669

May 25, 1989

Mr. Carl B. Everett Saul, Ewing, Remick and Saul 3800 Centre Square West Philadelphia, PA 19102

SUBJ: METRO CONTAINER SITE

REF: MAY 24, 1989 MEETING BETWEEN YOURSELF AND BOB NOVAK

Dear Mr. Everett:

It is our understanding you have authorized MK Environmental to proceed with solidification and TCLP testing of the sludges from the tanks, berms, drums, lagoon in the southwest corner of the site and the concrete holding tank. Additionally, permission was given to perform analytical characterization of the poly tanks inside the berm at the southwest corner of the drum recycling plant and to quickly dispose of any acid in them to avoid any sudden discharge. M-K is to be provided authorization to proceed and receive payment for these efforts by your acknowledgement of this letter.

The following items were discussed and affirmed by yourself:

- M-K will have the use of the existing office building, white office trailer, locker building, and any furniture in these units.
- The utilities are to placed in M-K's name.
- M-K will install a personnel gate on the south side of the office building.
- M-K will install a concrete decon pad and two concrete drum staging pads.
- M-K can install a covered structure for a craft personnel eating area.

#### MK-ENVIRONMENTAL SERVICES

Letter to: Mr. Carl 8. Everett May 25, 1989 Page 2

- M-K will dispose of non-RCRA junk steel, etc. as necessary to minimize hazards in the work area.
- M-K is to characterize and run a leak test on an underground fuel storage tank on the north side of the office.
- M-K is to utilize bar coding for control and data base collection purposes.

The following items were discussed and you are to review and let us know:

- Can M-K utilize semi-trailer vans from the AMF barrel yard for storing supplies on the Metro Container site?
- Disposition of any vehicles currently on the Metro Container site.
- Can M-K change locks on buildings and gates?

The following is information we feel is pertinent to the site and is a result of our site review and sampling efforts authorized by your May 22. 1989 letter to Bob Novak.

- A site map with the September 19, 1988 USEPA site safety plan and an aerial photo presented to you at this meeting shows a lagoon in the southwest corner of the site. That area is currently covered with barrels and we feel there is a possibility of contaminated soils under those barrels.
- In tracing a hose from an empty sludge tank at the west end of the drum recycling building, we have discovered quantities of sludge and water in several sub-floor areas of that building, which appear to be leaking from the foundation and co-mingling with the surface water on the site. In addition, there is sludge, ash, contaminated water, loose barrel parts, and miscellaneous equipment on the floor of the same building.

As requested, I did a quick survey of the drums across the street and they are similar to what is on the Metro Container site.

We will keep you advised of any additional findings and we look forward to working with you on this effort.

A. a. Kovaly

#### MK-ENVIRONMENTAL SERVICES

Letter to: Mr. Carl B. Everett May 25, 1989 Page 3

Please acknowledge your acceptance of these items by signing the acknowledgement block below and returning to (Fax #) 208/386-6669.

Very truly yours.

Robert A. Novak Project Manager

RAN/hew

cc: Art Peavey
Larry Eaton
Dick Plov
B.P. Claytor
File

Acknowledged as clarified in attached letter of May 26, 1989

> ACKNOWLEDGEMENT Carl B. Everett

Cal B. Evenes

end the west worm folder es Product Co." ~ 5 e/ Pa/ Matin Centains

#### LAW OFFICES OF

#### SAUL, EWING, REMICK & SAUL

3800 CENTRE SQUARE WEST

SS VALLEY STREAM PARKWAY
SUITE 330
GREAT VALLEY CORPORATE CENTER
MALVERN PA 19355
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(215) 972-7777

CABLE ADDRESS: BIDSAL
TELECOPIER (215) 972-7725
TWX 83-4798

222 DELAWARE AVENUE P. O. BOX 1266 WILMINGTON DE 19899 (302) 654-1413

1901 L STREET, N. W. SUITE 700 WASHINGTON, D. C. 20036 (202) 223-7660

TWENTY-FIRST FLOOR 237 PARK AVENUE NEW YORK NY 10017 (212) 551-3502

DIAL DIRECT (215)

972-7171

May 31, 1989

John C. Laager, Esquire Atlantic Richfield Company 515 South Flower Street Los Angeles, CA 90071

Re: Metro Container

Dear John:

Per our conversation, enclosed for your review are copies of the August, 1984 receipts involving Arco Petroleum Products Company. It appears that Metro took in 1,624 drums from Arco sources during the month.

There are similar documents for other months.

Please let me know if you wish to arrange a site visit. With any luck the files will still be there when you make your next trip east.

Sincerely,

Carl B. Everett

CBE/mml Enclosures

cc: Metro PRP Group (w/o encl.)

Division of A no - Richfield Company

2700 PASSYUNK AVENUE PHILALELPHIA, PA 19145 ATTN: J.P. GALLAGHER

ROOM 210

Date 9-17-84 Number *8

METRO CONTAINER CORP. 2ND & PRICE STREET TRAINER, PA 19016

We this d	lay charge your account	Terms:	
			NET CASH ON RECEIPT OF INVOICE
			8-1-84 THRU 8-31-84 (dates)
	DRUM SALE	4500 PHILA	
		LESS FREIGHT	
	1624 DRUMS	* @ 3.50 EACH	¥ 5684.00
	<u> </u>	<b>⊘</b> 1.00 EACH	272.00 \$5,4/2.00
			Credit \$5412.00 7140 J-476
			Charge \$ 272.00
			8678 J-476
•			

* PLOR NEW CONTRACT EFFECTIVE 8-1-84

BILLED ON MEMO # 4215-Cade Spot 327 Due. + Soft e 1.00

794.10 50.00 112,86

Report of Empty Raw Dru	ms Received:		Period _	8/1/84 thru 8/31/84
Na me	Address	Date Rec'd	Carrier	•
DRAY DELIVERY		·	·	648
Following Drums p.u. Metr	o Carriers - Credit \$1.	per drum		
United Oil Co.	Baltimore, Md. 19	8/24/84	Metro	40
Paterson Motor Oil	Paterson, N.J.	7/31/84	Metro	20
The Oil Man	Hurffville, N.J.	8/6/84	Metro	65
Pedroni Fuel	Vineland, N.J. 100	8/20/84	Metro	38
Brinkers Fuel	Doylestown, Pa. 17	8/20/84	Metro	43
Solar Compounds	Linden, N.J. 175	8/21/84	Metro	66
		TOTAL		272
Following drums del'd by	Customers			
Manassas Fuel	Manassas, Va.	8/20/84	Cust.	41
Carl King, Inc.	Camden, De.	8/14/84	Cust.	123
Kellam	Bell Haven, Va.	7/30/84	Cust.	158
Jay Gress	Norristown, Pa.	7/31/84	Cust.	4
· AC & T Co.	Hagerstown, Md.	8/16/84	Cust	37
Wilkinson Industries	Franklinville, N.J.	8/15/84	Cust.	17
Troutman's Oil	Millersburg, Pa.	8/21/84	Cust.	132
Wilson Mushroom Co.	Avondale, Pa.	8/23/84	Cust.	6
Jay Gress	Norristown, Pa.	8/28/84	Cust.	19
Tri-Gas & Oil	Federalsburg, Md.	8/29/84	Cust.	55
Jay Gress	Norristown, Pa.	8/7/84	Cust.	44

## TOTAL PACKAGES RECEIVED

Mail Original - Atlantic Richfield Co.

3144 Passyunk Ave Phila., Pa. 19101

Attn: Tom Halpin

Atlantic Richfield Co. ARCO
3144 Passyunk Ave 515 S
Phila., Pa. 19101 Los As

Attn: John Dudo Attn:

ARCO
515 S.Flowe
Los Angeles
Carl Moore

ort of Empty Raw Dr		Period Date				
Namo	Address	Rec'd	Carrier	Total De-		
Name	T Address	REC U	Calliel	Total Rec		
Hutter, Inc.	Jonestown, Pa.	8/21/84	Cust.	40		
		TOTAL		636		
Following drums del'd by	Customers - "Collect"					
Arco	Marcus Hook, Pa.	8/7/84	Proctor	1		
Polt Bus Serv.	Lebanon, N.J.	8/29/84	Proctor	3		
Accurate Screwing Mach.	Columbus, N.J.	8/29/84	Proctor	2		
Wainwright Oil Co.	Dryden, N.Y.	8/31/84	Oneida	12		
Kawneer Co.	Harrisburg, Va.	8/9/84	Houff	50		
		TOTAL		68		
	` `					
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Mail Original - Atlantic Richfield Co.

3144 Passyunk Ave Phila., Pa. 19101

Tom Halpin Attn:

Attn: John Dudo

Atlantic Richfield Co. 3144 Passyunk Ave Phila., Pa. 19101

TOTAL PACKAGES RECEIVED

515 S.Flowe Los Angeles Carl Moore

**ARCO** 

1624

Metro -

0.3)+ 0.35+ 0.3)+ 0.43+ 0.65+ 0.40+ 3.22+ How p4

eum Products Company
Division of AtlanticRichfletdCompany

Receipt for Return of Empty
Containers and Merchandise

No. 079681

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	Manager (Mrs. 1985)

Mater. 1A

APPC-3173

(8-82)

## AR P( ) leum Products Company Division of Atlantic Richfield Company

Receipt for Return of Empty
Containers and Merchandise

No. 079679

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Division of AtlanticRichtfoldCompany
Receipt for Return of Empty
Containers and Merchandise

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No. 079678

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# AR Pulleum Products Company Division of Atlantic Richfold Company Receipt for Return of Empty Containers and Merchandise

No. 079673

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APPC-3173	(8	3-82)												_						

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(8-82)

APPC-3173

## Products Company Division of AtlanticRichfieldCompany

Via

## Receipt for Return of Empty Containers and Merchandise

Date

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APPC-3173

(8-82)

ARI F pleum Products Company
Division of Atlantic Richfield Company
Receipt for Return of Empty
Containers and Merchandise

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No. 079689

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AP \ I roleum Products Company
Division of AtlanticRichtieldCompany
Receipt for Return of Empty
Containers and Merchandise

No. 079695

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# ARC Polleum Products Company Division of Atlantic Richitela Company Receipt for Return of Empty Containers and Merchandise

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APPC-3173	(8-82)	- 3				***************************************				<del></del>		•						

ICC-MC-119207 PUC-A-35093 CONSIGNEE'S RECEIPT TELEPHONE

(609) 663-6720

PROCTOR EXPRESS, INC.

PRO. (PROC) No. 199503

Shipper's No.

DELAIR, N. J. 08110

8/27/84

_19

Shipper

ACCURATE SCREWING MACHINE

MILL LANE COLUMBUS NJ 08022 Address

Consignee Destination METRO CONTAINER TAINER M.

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### AP 1 roleum Products Company

Division of AtlanticRichfieldCompany

### Receipt for Return of Empty Containers and Merchandise

No. 079692

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eceived into sto	ck by													1						

ICC-MC-119207 PUC-A-35093 CONSIGNEE'S RECEIPT TELEPHONE

(609) 663-6720

## PROCTOR EXPRESS, INC. P. O. BOX 335 DELAIR, N. J. 08110

PRO. (PROC) No. 199518
6079

Shipper's No.

8/28/84 Date

Shipper **Address**  POLT DUS SERVICES DEVEY LAKE LEBANON NJ 08030

Consignee Destination HETRO CONTAINER TRAINER M.

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classifications and exceptions and revises thereof issued by F. G. Freund, agent.

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AP I roleum Products Company
Division of Atlantic Richfield Company
Receipt for Return of Empty
Containers and Merchandise

No. 079675

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HOUFF TRANSFER, INC. TERMINALS TERMINALS RICHMOND, VA. BALTIMORE, MD. CHARLESTON, W. VA. WEYERS CAVE, VA. WHEELING, W. VA. MAIN OFFICE, P. O. BOX 91 HUNTINGTON, W. VA. 'HILADELPHIA. PA. STAUNTON, VA. LYNCHBURG, VA. WEYERS CAVE, VA. 24486 PRO NO. DATE URAL PRODUCTS SHIPPERS NO. TRUCK NO. TRAILER NO. POINT OF INTERCHANGE NO. PACKAGES, ARTICLES, DESCRIPTION WEIGHT RATE PREPAID 50 DOTY DRUM RECEIVED AUG 0 9 1984 Metro Container Corps

RECEIVED ABOVE IN GOOD CONDITION

MAKE CHECKS PAYABLE TO HOUFF TRANSFER, WEYERS CAVE, VA. WITHIN SEVEN DAYS IN ACCORDANCE WITH SECTION

RECEIVED PAYMENT

223 OF THE INTERSTATE COMMERCE ACT.

DIVISIONS

HOUFF

COLLECT

ZEDVERS

KEAL LIMIT

S WATHER

### **!!**Kawneer 图 DEBIT KAWNEER COMPANY, INC. 1531 CCUNTRY CLUB ROAD PARRISONSURG, VIRGINIA 22801 USA (703) 433-2711 MEMO MEMORANDUM ☐ SHIPPER No.16799 DATE CHARGE ISSUED TO: ARCO 7-19-84 C/O Metro Container Corp. K-ORDER NO. YOUR INVOICE NO. Prince Avenue Trainor, PA 19013 AUTHORIZATIO COL WEIGHT Houff Treasfer QTY QTY DESCRIPTION , QTY. UNIT FIN. BOX NUMBERS AMOUNT SHIPPED B.O. Empty Drums (Duro 117 Press 011) PACKING LIST

· ·	PURCHASE	
أمسا	INSPECTION No 5936	
September 2010	DATE: 8-9-84	
	RECEIVED FROM: Kawreen Co.	
	DRIVER: Harrisonburg, Va.	
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ARC Poleum Products Company
Division of AtlanticRichtfieldCompany
Receipt for Return of Empty
Containers and Merchandise

No. 079674

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issuer

19207 PUC-A-35093 3NE^{PJ}S RECEIPT TELEPHONE

-1) 663-6720

# PROCTOR EXPRESS, INC. P.O. BOX 335 DELAIR, N. J. 08110

PRO. (PROC) No. 197950

Shipper's No.

Date_ 8/1/84

Shipper ARCO

Address MARCUS HOOK, PA.

MEETRO COMPAINER Consignee SECOND & PRICE Destination

	Trans.	То:		Trans. From:		9	
DRUM  RETURNED ON OUR PRO 197822 DATED 7/30/8				WEIGHT	RATE	FRT. CHARGES	TOTAL
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Received the above described shipment in good condition except as noted.				nipment consignee.	10cc	- pur	No. PCS

classifications and exceptions and revises thereof issued by F. G. Freund, agent

ICC-MC-1 THASE 197956
INSPECTION Nº 5926 DATE: 8/3/84
RECEIVED FROM: AMO 4500
DRIVER: PATON

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0.05+

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6.48*

Date Name (mailing address if other Stock 9 movement code Street address City, state, zip code Approved Cr. Send A/C check Type Attach Late Cash Net amount of inv. Payee code Due date Reference no. Check no. X=cr. Invoice date C Tax X= Amount subject Account Cost Center Facility Type Free form area Net amount cr. code to tax Packages Unit price Tax Price + Tax **Product** Articles received are subject Quantity Amount to inspection at our warehouse code Kind Code No. \$ State Fed \$ Empty 55 gallon drums 1-97493 55D 001 000 1-62760 000 \$6.00 000 **Pallets** Reason for return Plus sales tax Purchase date Original deliver Product returns show Total invoice number Received by Approved by Received into stock by

Issuer

APPC-3173

(8-82)

oleum Products Company

Receipt for Return of Empty
Containers and Merchandise

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## PURCHASE INSPECTION Nº 5892

DATE: 8-2-84

RECEIVED FROM: aca /4500

DRIVER: theun # 22348

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### METRO CONTAINER

APPC-3173

(8-82)

### AF Poleum Products Company Division of AtlanticRichfieldCompany Receipt for Return of Empty

Containers and Merchandise

Via

No. 085764

Date ___

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1-62760	\$6.00	000	000				Pal	lets									
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Received into	stock by																

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54	•

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eum Products Company

Receipt for Return of Empty Containers and Merchandise

Total

APPC-3173

Approved by

Product returns show

Received into stock by

(8-82)

Purchase date

Issuer

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Original delivery

invoice number

Received by

PUR SE INSPECTION Nº 6033 DATE: 8-23-84	
 PRECEIVED FROM: aco /4500 DRIVER: #22390	
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AR Poleum Products Company
Division of Atlantic Richfield Company
Receipt for Return of Empty
Containers and Merchandise

No. 085760

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City, state, zip	code		Ä	•						Cr. A/C			Send check	1	oprove	d	***************************************				
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APPC-3173	(8	-82)		)																	

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PURCHASE, INSPECTION Nº 6022	
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RECEIVED FROM: Cuco /4500  DRIVER: Lurs # 22356	=
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# AF of roleum Products Company Division of Atlantic Richfield Company Receipt for Return of Empty Containers and Merchandise

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Product		Package	s			Articles-rec	eived are su	ubiect		Jnit price	•	ax	Price	+ Tax		***************************************
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APPC-3173	(8	3-82)			a sheeps a											

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APPC-3173

(8-82)

A' 7 F oleum Products Company
Division of AtlanticRichfieldCompany
Receipt for Return of Empty
Containers and Merchandise

No. 083136

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### PURCHASE INSPECTION

Nº 5927

DATE: 8-7-84

RECEIVED FROM: also / 4500

DRIVER: #22357

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ARC Per Yeum Products Company
District of Attentic Richfield Company
Receipt for Return of Empty
Containers and Merchandise

No. 082844

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City, state, zip code	
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AF ) F oleum Products Company

Division of AtlanticRichfieldCompany

Receipt for Return of Empty

Containers and Merchandise

No. 082834

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Customer

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No. 082828

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Product		Package	es .			Articles red	ceived are s	ubject	Un	it price	T:	ax	Price	+ Tax		25°	
code	Kind	Code	No.	Quantity	to	inspection	inspection at our warehouse			¢	State	Fed	\$	¢		Amount	זנ
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### PURCHASE INSPECTION

Nº 5905

DATE:	8-3	-84

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# AR P oleum Products Company Division of AtlanticRichfieldCompany Receipt for Return of Empty Containers and Merchandise

No. 082825

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Issuer

(8-82)

APPC-3173

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AP Foleum Products Company
Division of Atlantic Richfield Company
Receipt for Return of Empty
Containers and Merchandise

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Issuer

APPC-3173

(8-82)

PURCHASE . INSPECTION Nº 5975	
DATE: 8-16-84  RECEIVED FROM: Outo/4500  DRIVER: #22356	
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# · METRO CONTAINER

ARC Proleum Products Company
Division of Atlantic Richfold Company
Receipt for Return of Empty
Containers and Merchandise

No. 092112

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APPC-3173	(8	-82)												•						

PURCHASE
INSPECTION NO 5904

DATE: 8-3-14

RECEIVED FROM: Acaptor

DRIVER:

9 18-5a.

METRO CONTAINER

AP roleum Products Company
Division of Atlantic Richfield Company
Receipt for Return of Empty
Containers and Merchandise

No. 083115

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Division of AtlanticRichfieldCompany
Receipt for Return of Empty

Containers and Merchandise

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METRO CONTAINEL

APPC-3173

(8-82)

AR P pleum Products Company
Division of Atlantic Richfield Company
Receipt for Return of Empty
Containers and Merchandise

No. 0A3113

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Metro Contain

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Packages

Code

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Purchase date

No.

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Kind

55D

\$6.00

Reference no.

Facility

Quantity

Name (mailing,address if other than above)

Street address

Payee code

City, state, zip code

Account

Product

code

1-97493

1-62760

Reason for return

Approved by

Product returns show

Received into stock by

### ARC Pet sum Products Company Division of Atlantic Richfield Company Receipt for Return of Empty Containers and Merchandise

No. 082847

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(8-82)APPC-3173

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Received by

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DATE:	8-7-84	

Nº 5925

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DRIVER: #22390 75 18-ja. Hem

ARCP Pet 'eum Products Company
Division of AtlanticRichfieldCompany
Receipt for Return of Empty
Containers and Merchandise

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ARC Petroleum Products Company
Division of AtlanticRichifeldCompany
Accept for Return of Empty
Containers and Merchandise

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APPC-3173

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AR Poleum Products Company
Division of AtlanticRichfoldCompany
Receipt for Return of Empty
Containers and Merchandise

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ARC OE leum Products Company
Division of AtlanticRichfieldCompany
Receipt for Return of Empty
Containers and Merchandise

No. 079684

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PURCHASE INSPECTION Nº 6047  DATE: 8-23-84  RECEIVED FROM: Aco / 4500  DRIVER:
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(8-82)

APPC-3173

# ARC Pe' 'eum Products Company Division of AtlanticRichtfeldCompany Receipt for Return of Empty Containers and Merchandise

No. 079682

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Receipt for Return of Empty **Containers and Merchandise** Name (mailing address if other than above) Stock movement code Street address City, state, zip code Approved Send Cr. A/C check Cash disc. Payee code Due date Attach X=cr. Invoice date Reference no. Net amount of inv. Check no. Type C Tax X= Amount subject Cost Center Facility Type Account Free form area Net amount code to tax CT. Packages Unit price Price + Tax Articles received are subject **Product** Quantity Amount to inspection at our warehouse State Fed റ്റവ്ക Kind Code No. \$ ¢ Ø. Empty 55 gallon drums 1-97493 001 SSO. 000 000 1482760 98.00 000 RECEIVED AUG 06 1984 Metro Container Corps Reason for return Plus sales tax Purchase date Original delivery Total Product returns show invoice number

pleum Products Company

APPC-3173

Approved by

Received into stock by

(8-82)

Issuer

Received by

PURCHASE INSPECTION No. 5920 DATE: 8-7-84	Topic venezation formulae regions is a
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AR P pleum Products Company
Division of Atlantic Richfield Company
Receipt for Return of Empty
Containers and Merchandise

No. 079670

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### PURCHASE INSPECTION

Nº . 5880

DATE: 7-31-84

RECEIVED FROM: aco/4500

DRIVER: 18-5a.

ARC Pe leum Products Company
Division of Attantic Richtied Company
Receipt for Return of Empty
Containers and Merchandise

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# ARC Poleum Products Company Division of AttanticRichfieldCompany Receipt for Return of Empty Containers and Merchandise

No. 079668

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APPC-3173

(8-82)

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ARC P pleum Products Company
Distalon of AffanticRichfieldCompany
Receipt for Return of Empty
Containers and Merchandise

No. 079666

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ARC Poleum Products Company
Division of AtlanticRichfieldCompany
Receipt for Return of Empty
Containers and Merchandise

No. 079694

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ARC P oleum Products Company
Division of AtlanticRichfieldCompany
Receipt for Return of Empty
Containers and Merchandise

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# ARC Poleum Products Company Division of AtlanticRichfieldCompany Receipt for Return of Empty Containers and Merchandise

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Division of Atlantic Richfield Company
Receipt for Return of Empty
Containers and Merchandise

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Issuer

Received into stock by

(8-82)

APPC-3173

AR( P oleum Products Company
Division of AtlanticRichfieldCompany
Receipt for Return of Empty

**Containers and Merchandise** 

No. U85762

PÜRCHASE
INSPECTION Nº 6076

DATE: 8-29-84
RECEIVED FROM: Aco-/4500

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Receipt for Return of Empty

Containers and Merchandise

No. 087848

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ARC P oleum Products Company
United of Atlantic Richtfield Company

Receipt for Return of Empty Containers and Merchandise

No. 079700

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ARC P oleum Products Company
Division of AtlanticRichfieldCompany
Receipt for Return of Empty
Containers and Merchandise

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ARC P pleum Products Company
District of Atlantic Richfield Company
Receipt for Return of Empty
Containers and Merchandise

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APPC-3173

(8-82)

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AR I roleum Products Company
Division of AtlanticRichfieldCompany
Receipt for Return of Empty
Containers and Merchandise

No. 079683

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ARC P oleum Products Company
Division of Atlantic Richfield Company
Receipt for Return of Empty
Containers and Merchandise

No. 079680

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-TROUTMAN'S OIL SERVICE, INC.
308 Center Street (L)
MILLERSBURG, PA 17061
(717) 692-4821

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Thank You

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ARC Dleum Products Company
Division of AtlanticRichfieldCompany
Receipt for Return of Empty
Containers and Merchandise

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Street					Street	531 N. D	elsea Dr.	P. Q. Box	126	
Destination	T	rainer, Pa.		Zip Code	Origin	Franklisvi	ile, New Ja	rsey 083	22	
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are required to stat declared value of th	e specifical e property.		This to certify that the erly classified, described and are in proper condition	above named material ire prop- packaged, marked as disbeled, in for transportation according to	delivered to t	Section 7 of the cor he consignee without sign the following stat	recourse on the co tement:	nsignor, the con-	CHAR	GES: \$
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Bill of Lading, and condition above which s any person or its usual plac	the prop of conter aid carrie r corporat e of deliv	erty described above in this of packages unknow or (the word carrier being ion in possession of the very at said destination	n apparent good order vn), marked consigned g understood through e property under the i, if on its route, othe	the date of the issue of this, except as noted (contents, and destined as indicated out this contract as meaning contract) agrees to carry to rwise to deliver to another each carrier of all or any of.	time intere be subject date of shi Shipper in the gove	rty over all or any sted in all or any s to all the bill of is pment. hereby certifies i	y portion of said said property, the ading terms and that he is familian and the said	nat every serving to conditions in iar with all the terms and con-	tination are to be possible gove	nd as to each party at any performed hereunder shall rning classification on the iding terms and conditions a hereby agreed to by the
SHIPPER		UNSON INDUS	TRES, INC.		CARRIER					
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Thin Shipping Order must be legibly filled in, in link, in Indelline Pencil, or in Carbon, and retained by the Anen?

Agent must detach and retain this Shipping Order and must sign the Original Bill of Lading.

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Metro-kontuni Human, PA. ARC P pleum Products Company
Division of Atlantic Richfield Company

Receipt for Return of Empty
Containers and Merchandise

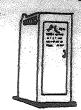
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CUSTOMER'S • A TCO PO

Arco Petroleum Products

Philadelphia, Pa.



A. C. & T. CO., INC.

HALFWAY BOULEVARD AND HOPEWELL ROAD

ROUTE 2 - BOX 376-A HAGERSTOWN, MD. 21740

PHONE: AREA CODE 301 582-2700



TE	ELEPHONE	PER:	SON PLA	CING ORDER	CUSTOMER'S P.O. OR JOB NO.	LOCATION OF JOB
8/	DATE 15/84	DELIVERY	CHARGES	PICK-UP CHARGES	ORDER TAKEN BY	
DEL. NO.	QUANTITY	PICK UP	- 4		DESCRIP	PTION UNIT PRICE AMOUNT
	37			Drums retur		RECEIVED  RECEIVED  AUG 16 1984  AUG 16 1984  AUG 16 1984  AUG 16 1984
					RENTAL AGREEMENT	AND CONDITIONS

LESSEE ACKNOWLEDGES: Receipt of said equipment in good working condition and repair and upon expiration of Lessee's use thereof, Lessee shall return same to Lessor, in as good condition and repair as when delivered, subject to reasonable wear and tear. Customer responsible for lost or stolen equipment, re A.

Lessee Agrees: To pay the specific rent for use of said equipment - To not release this equipment from Lessee's control without prior authorization from Lessor - To not move said equipment to any other job without prior consent of Lessor - To assure sole responsibility for proper placing of said rented equipment on the job location - To locate portable toilets in such a manner that the service trucks at all times can drive within 25 feet for servicing. - To idemnify Lessor against all loss, damage, expense and penalty arising from any action or claim on account of any injury to person or property of any character whatsoever occasioned by the operation, handling, transportation and/or use of any of the barricades and/or warning lights and/or portable toilets during rental period, and while said equipment is in the possession or under the custody of Lessee - To pay to Lessor reasonable attorney's, fee and collection costs incurred by Lessor in enforcing the terms of this agreement, or Lessee fails to pay rent or to pay damages to said equipment while in Lessee's possession.

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ELIVERED	CUSTOMER'S	
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- RENTAL SERVICE -

BARRICADES WITH BLINKER-LITES

PORTABLE CHEMICAL TOILETS
MOLDED FIBERGLAS CHEMICAL TOILETS

PURCHASE INSPECTION Nº 5973  DATE: 8-16-84  RECEIVED FROM: Alex A C & Co.  DRIVER: Md.  DRIVER: Cust. acco-	
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ARC Per leum Products Company Division of AtlanticRichtfoldCompany Receipt for Return of Empty Containers and Merchandise No. 079667

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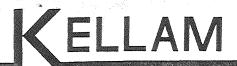
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Metro-Cont.

ARC leum Products Company
Division of Atlantic Richfield Company
Receipt for Return of Empty
Containers and Merchandise

No. 079665

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KELLAM PROPANE GAS COMPANY, INC.

BELLE HAVEN, VIRGINIA 23306

(804) 442-5811

Date 7/30/84

Atlantic Richfield

158. 55 gallon drums returned at \$22 each. Total \$3476.00

Send payment to Kellam Distributing Co. PO Box 246 Belle Haven, VA 23306-0246

kmh

RECEIVED

JUL 3 0 1984

Metro Container Corps

SKelly





KELLAM PROPANE GAS COMPANY, INC.

BELLE HAVEN, VIRGINIA 23306

(804) 442-5811

Date 7/30/84

Atlantic Richfield

158. 55 gallon drums returned at \$22 each. Total \$ 3476.00

Send payment to Kellam Distributing Co. PO Box 246 Belle Haven, VA 23306-0246

kmh

RECEIVED

JUL 3 0 1984

Metro Container Corps

Skelly



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	PURCHASE · 1965	
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Number of Drums for ARCO CHEMICAL

was

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DRUM NUMBER	START LOCATION	ID DATE	OWNER	TYPE	SIZE	Status	CONDITION	COLOR	MARKINGS
00/57		7/12/90	DVIADV	OTES	:	C1 00FD	DUOTED		FLANMANI E DENTANE
00457 Number	ZONE 1 of Drums for		DYLARK was	STEEL 1	55	CLOSED	RUSTED	LT. BLUE	FLAMMABLE PENTANE
01078 Number	ZONE 1 of Drums for	• •	STEEL	STEEL 1	55	CLOSED	SOUND	BLUE	KLINGFAST
00910 Number		7/13/89 ACETO CHEMICAL	ACETO CHEMICAL CO.	STEEL 1	55	CLOSED	SOUND	BLACK	ANTIOXIDANT
00143 Number	ZONE 1	• •	AETNA CHEM Was	STEEL 1	55	CLOSED	SOUND	BLACK	CORROSIVE
00084		7/10/89	AJAX ADHESIV	STEEL 1	55	CLOSED	SMASHED	RUST	FLAMMABLE
00535			was	STEEL	55	CLOSED	SMASHED	RED	AUTOTRANS FLUID
Number	of Drums for	AMC-JEEP-RENAL	ULT was	1					
00077			AMERICAN CHEMICAL	STEEL	55	CLOSED	SOUND	BLACK	CAUSTIC SODA
00158	ZONE 1	7/11/89	AMERICAN CHEMICAL	STEEL	55	CLOSED	SOUND	BLACK	CORROSIVE 30% LIQ CAUSTIC SODA
00174	ZONE 1	7/11/89	AMERICAN CHEMICAL	STEEL	55	CLOSED	SOUND	RUST	30% CAUSTIC SODA
00186	ZONE 1	7/11/89	AMERICAN CHEMICAL	STEEL	55	CLOSED	SOUND	BLACK	CAUSTIC 30% SODA
00251	ZONE 1	7/11/89	AMERICAN CHEMICAL	STEEL	55	CLOSED	SOUND	BLACK	LIQUID CAUSTIC SODA
00461 Number	ZONE 1 of Drums for	7/12/89 AMERICAN CHEMI	AMERICAN CHEMICAL ICAL was	STEEL 6	55	CLOSED	RUSTED	RUST	CORROSIVE 30% LIQUID CAUSTIC SODA
00723	ZONE 1	7/12/89	ARCO CHEMICAL	STEEL	55	OPEN	SOUND	BLUE	NONE
00920	ZONE 1	7/13/89	ARCO CHEMICAL	STEEL	55	CLOSED	SOUND	BLACK	IPC 8505
01179	ZONE 1	7/12/89	ARCO CHEMICAL	STEEL	55	CLOSED	SOUND	BLACK	IPC 7235
01180	ZONE 1	7/12/89	ARCO CHEMICAL	STEEL	55	CLOSED	SOUND	BLACK	IPC 9370
01187	ZONE 1	7/12/89	ARCO CHEMICAL	STEEL	55	CLOSED	SOUND	BLACK	IPC 9300
01190	ZONE 1	7/12/89	ARCO CHEMICAL	STEEL	55	CLOSED	SOUND	BLACK	IPC 9475
01410	ZONE 1	7/13/89	ARCO CHEMICAL	STEEL	55	CLOSED	SOUND	BLACK	NONE

RCR/	A EMPTY	PHYSICAL STATE	TOTAL VOLUME	OVA	CGI	RAD	PH	CONTENTS	SAMPLE NUMBER O	SAMPLE NE NUMBER TWO
	Y	NA	0	PASS	PASS	PASS	PASS	<b>NA</b>	NA	NA
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DRUM Number	START LOCATION	ID DATE	OWNER		TYPE	SIZE	STATUS .	CONDITION	COLOR	MARKINGS
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00106	ZONE 1	7/11/89	ASHLAND		STEEL	55	CLOSED	SOUND	BLACK	1,1,1,-TRICHLOROETHANE
Number of	f Drums for A	ASHLAND	was	1						
00387	ZONE 1	7/11/89	ASHLAND CHEM		STEEL	55	CLOSED	SOUND	BLACK	HAZARDOUSE WASTE TRICHLOROETHANE
00388	ZONE 1	7/11/89	ASHLAND CHEM		STEEL	55	CLOSED	SOUND	BLACK	HAZARDOUS WASTE 1,1,1 TRICHLOROETHAN
00391	ZONE 1	7/11/89	ASHLAND CHEM		STEEL	55	CLOSED	SOUND	BLACK	TRICHLOROETHANE
00396	ZONE 1	7/11/89	ASHLAND CHEM		STEEL	55	CLOSED	SOUND	BLACK	TRICHLOROETHANE HAZARDOUS WASTE
00402	ZONE 1	7/11/89	ASHLAND CHEM		STEEL	55	CLOSED	SOUND	BLACK	TRICHLOROETHANE
Number of	f Drums for A	ASHLAND CHEM	was	5						
01355	ZONE 1	7/13/89	B.S.C. NEW YORK		STEEL	55	CLOSED	SOUND	BLUE	3531 28344 MADE IN JAPAN
lumber of	f Drums for E	B.S.C. NEW YOR	RK was	1				,		
01374	ZONE 1	7/10/89	BEL RAY		STEEL	55	CLOSED	RUSTED	BLUE	LUBRICANT
Number of	f Drums for I	BEL RAY	was	1						
00685	ZONE 1	7/12/89	BETHLEHEM STEEL CO	RP.	STEEL	55	CLOSED	RUSTED	BLACK	KLING FAST
Number of	f Drums for E	BETHLEHEM STEI	EL CORP. was	1						
00656	ZONE 1	7/13/89	ВР		STEEL	55	CLOSED	RUSTED	RUST	VANILLUS SUPER MOTOR OIL
00722	ZONE 1	7/12/89	ВР		STEEL	55	CLOSED	SOUND	BLUE	SEVORA 53A
01337	ZONE 1	7/13/89	BP		STEEL	55	CLOSED	SMASHED	GREEN	ENERGOL QA20
Number of	f Drums for E	3P	was	3	•					
01191	ZONE 1	7/12/89	BY-CHEM		STEEL	55	CLOSED	SOUND	BLUE	NONE
lumber of	f Drums for E	BY-CHEM	was	1			:			
00086	ZONE 1	7/11/89	CHEVRON		STEEL	55	CLOSED	SOUND	BLUE	TORQUE FLUID 5
00459	ZONE 1	7/12/89	CHEVRON		STEEL	55	CLOSED	RUSTED	BLUE	MOTOR OIL
00460	ZONE 1	7/12/89	CHEVRON		STEEL	55	CLOSED	RUSTED	RUST	HYDRAULIC OIL
00504	ZONE 1	7/12/89	CHEVRON		STEEL	55	CLOSED	SMASHED	BLUE	OIL
lumber of	f Drums for (	CHEVRON	was	4						
00097	ZONE 1	7/11/89	CITGO		STEEL	55	CLOSED	SMASHED	RED	OIL
Number of	f Drums for C	CITGO	was	1						

DRUM NUMBER	START LOCATION	ID DATE	OWNER	TYPE	SIZE	STATUS	- CONDITION	COLOR	MARKINGS
00252	ZONE 1	7/11/89	ROHM - HAAS	STEEL	55	CLOSED	SOUND	BLACK	ACETONE
00634	ZONE 1	7/10/89	ROHM - HAAS	STEEL	55	CLOSED	SOUND	BLACK	NONE
00634	ZONE 1	7/13/89	ROHM - HAAS	STEEL	55	CLOSED	SOUND	BLACK	RHEOLOGY MODIFER
00906	ZONE 1	7/13/89	ROHM - HAAS	STEEL	55	CLOSED	SOUND	BLACK	BAYBOUND PU-402A
00926	ZONE 1	7/13/89	ROHM - HAAS	STEEL	55	CLOSED	SOUND	BLACK	BAYBOND PU-402A
00929	ZONE 1	7/13/89	ROHM - HAAS	STEEL	55	CLOSED	SOUND	BLACK	BAYBOUND PU-402A
00993	ZONE 1	7/13/89	ROHM - HAAS	STEEL	55	CLOSED	SOUND	BLACK	BAYBOND PU-402A
01353	ZONE 1	7/13/89	ROHM - HAAS	STEEL	55	CLOSED	SOUND	RUST	RHEOLOGY MIXTURE COMBUSTIBLE
	f Drums for R		was 11				2		
01343	ZONE 1	7/13/89	ROHM TECH INC	STEEL	55	CLOSED	SOUND	WHITE	NYC 4 IMPEX
lumber o	f Drums for R		was 1						
00139	ZONE 1	7/11/89	ROHM&HAAS	STEEL	55	CLOSED	SOUND	BLACK	BENZYL CL
Number o	of Drums for R	OHM&HAAS	was 1						
01387	ZONE 1	7/10/89	S. BADER	STEEL	55	CLOSED	SOUND	BLUE	NONE
Number o	of Drums for S	. BADER	was 1						
00683	ZONE 1	7/12/89	SHELL	STEEL	55	CLOSED	SOUND	BLACK	FLAMMABLE POISON , EPICHLOROHYDRIN -
Number o	of Drums for S	HELL	was 1						·
00647	ZONE 1	7/13/89	SKF INDUSTRIES	STEEL	55	CLOSED	SOUND	RED	ZURN ALLMET
	f Drums for S								
00643	ZONE 1	7/13/89	SPECIALTY PRODUCTS CO	STEEL	55	CLOSED	SOUND	BLUE	KLEENMOLD 170
Š.	f Drums for S			31222	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	CLOSED	30010	BLOC	KEELMOLD 170
00231	ZONE 1	7/11/89	SQUIBB	STEEL	55	CLOSED	SOUND	BLACK	HAZARDOUS
	f Drums for S		was 1						
	***								
01364	ZONE 1	7/10/89	SUN PETROLEU	STEEL	55	CLOSED	RUSTED	BLUE	NONE
	f Drums for SI		was / 1	<del></del>				<del></del>	**************************************
00628	ZONE 1	7/13/89	SUN PETROLEUM PRODUCTS	STEEL	55	CLOSED	SOUND	BLUE	SUNAD E_0954-A FROM CHEMEX INC
Number of	f Drums for SI	UN PETROLEUM I	PRODUCTS was 1						_

RCR/	A EMPTY	PHYSICAL STATE	TOTAL VOLUME	OVA	CG1	RAD	PH	CONTENTS	SAMPLE NUMBER ONE	SAMPLE NUMBER	TWO
	Υ .	NA	0	PASS	PASS	PASS	PASS	NA	NA	NA	
	Y	NA	0		PASS			NA	NA	NA	
Sec.	Y	NA	0	PASS	PASS	PASS	PASS	NA	NA	NA	
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	Y	NA	0	PASS	PASS	PASS	PASS	NA	NA	NA	
1	Y	<b>NA</b>	0	PASS	PASS	PASS	PASS	NA	NA	, NA	
	Y	NA	0	FAIL	PASS	PASS	PASS	NA /	NA	NA	
	Y	NA	0	PASS	PASS	PASS	PASS	NA	NA	NA	
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	Y	NA NA	0	PASS	PASS	PASS	PASS	NA	NA	NA	
	Y	NA	0	PASS	PASS	PASS	PASS	NA NA	NA	NA	
	<b>Y</b>	NA	0	PASS	PASS	PASS	PASS	NA NA	NA	NA	·

DRUM NUMBER	START LOCATION	ID DATE	OWNER	ТҮРЕ	SIZE	STATUS -	CONDITION	COLOR	MARKINGS
00013	ZONE 1	7/10/89	SUN R&M	STEEL	55	CLOSED	SOUND	BLACK	FLAMMABLE
00019	ZONE 1	7/10/89	SUN R&M	STEEL	55	CLOSED	SOUND	BLACK	s_655_86
00021	ZONE 1	7/10/89	SUN R&M	STEEL	55	CLOSED	SOUND	BLACK	XYLENE
00189	ZONE 1	7/11/89	SUN R&M	STEEL	55	CLOSED	SOUND	BLACK	UN1203
Number o	of Drums for	SUN R&M	was 4						
01362	ZONE 1	7/13/89	SUN REFINER & MKT CO	STEEL	55	CLOSED	SOUND	BLUE	SUNAD E-0624-B
01363	ZONE 1	7/13/89	SUN REFINER & MKT CO	STEEL	55	CLOSED	SOUND	BLUE	SUNAD E-0624-B
Number o	of Drums for	SUN REFINER							
00020	ZONE 1	7/10/89	SUNOCO	STEEL	55	CLOSED	SOUND	BLACK	FLAMMABLE
00248	ZONE 1	7/11/89	SUNOCO	STEEL	55	CLOSED	SOUND	BLACK	FUEL OIL
Number o	of Drums for	SUNOCO	was 2						
00650 Number o	ZONE 1 of Drums for	7/13/89 SUPERIOR PIN	SUPERIOR PINTING INK CO TING INK CO was 1	STEEL	55	CLOSED	SOUND	BLACK	0297-07QВ
01344	ZONE 1	7/13/89	SUPERIOR PRINTING INK	STEEL	55	CLOSED	SOUND	BLACK	FH-1617-BK LOT955-129
Number (	of Drums for	SUPERIOR PRI	NTING INK was 1				(		
00649 Number o	ZONE 1 of Drums for		SUPERIOR PRINTING INK CO NTING INK CO was 1	STEEL	- 55	CLOSED	SOUND	BLACK	0294-07QB
00263 Number o	ZONE 1 of Drums for	7/11/89 TEXTILE	TEXTILE was 1	SŤEEL	55	CLOSED	SOUND	BLUE	FORMALDEHYDE W/11% METHANOL
00192	ZONE 1	7/11/89	TEXTILE CHEM	STEEL	55	CLOSED	SOUND	BLACK	FLAMMABLE PROPYLENE GLYCOL METHYL ETHER
Number o	of Drums for	TEXTILE CHEM	was 1						
00464 number d	ZONE 1 of Drums for	7/12/89 TEXTILE CHEM	TEXTILE CHEMICAL CO. ICAL CO. Was 1	STEEL	55	CLOSED	CORRODED	RUST	CORROSIVE LIQUID CAUSTIC SODA
00107	ZONE 1	7/11/89	TILLET CHEM	STEEL	55	CLOSED	SOUND	WHITE	CAUTION
Number o	of Drums for	TILLET CHEM	was 1						
00119	ZONE 1	7/11/89	TILLEY CHEM	STEEL	55	CLOSED	SOUND	WHITE	UNREADABLE

LAW OFFICES OF

## SAUL, EWING, REMICK & SAUL

3800 CENTRE SQUARE WEST

PHILADELPHIA PA 19102

TWENTY-FIRST FLOOR 237 PARK AVENUE NEW YORK NY 10017 (212) 551-3502

55 VALLEY STREAM PARKWAY
SUITE 330
GREAT VALLEY CORPORATE CENTER
MALVERN PA 19355
(215) 251-5050

(215) 972-7777

CABLE ADDRESS: BIDSAL TELECOPIER (215) 972-7725 TWX 83-4798 ONE RODNEY SQUARE
P. O. BOX 1266
WILMINGTON DE 19899
(302) 654-1413

ONE GREENTREE CENTRE SUITE 201 ROUTE 73 AND GREENTREE ROAD MARLTON NJ 08053 (609) 596-1777



DIAL DIRECT (215)

972-7171

January 10, 1990

CHRISTIAN, BARTON, EPPS, CHEMP & CHAPPEL

TO: Potentially Responsible Parties at Metro Container Site, Trainer, Pennsylvania

Ladies and Gentlemen:

On behalf of the Metro PRP Committee ("MPC"), I am writing this letter to (1) inform you that your company has been identified by EPA as a PRP at the Metro site, (2) provide a status report on removal activities, (3) provide copies of the contents of two databases which may pertain to your company and (4) solicit your participation in the process of allocating among all PRPs the costs incurred by the MPC in connection with site-related activities.

Earlier this year representatives of the MPC negotiated the enclosed Administrative Order on Consent as a means to conduct a removal action at the Metro Container site (Attachment 1). Various contractors were then asked to bid for the role of prime contractor, and MK-Ferguson Company was selected. MK entered into several key subcontracts. The first was with Sevenson, Inc., who performed drum characterization. The second was with OH Materials, who has handled site work, including drum crushing, tank removal and the loading of materials for off-site disposal. Hazardous wastes have gone to EnviroSafe's Oregon, Ohio facility. Non-hazardous liquids, principally rain water which has been abundant this year, were sent to Waste Conversion, Inc. of Horsham, Pennsylvania. Analytical work was performed by R.F. Weston. Total costs under the MK contract are estimated at \$5.1 million. Field activities were completed this month.

When we began negotiating the Administrative Order with EPA, we were informed that the Agency had retained Booz-Allen, a consulting firm, to develop a database of transactions using shipping papers obtained from the site operator. EPA transmitted

this information to the MPC in September, 1989. Those transactions which appear to involve your company are shown on Attachment 2.

As noted above, an MK subcontractor inventoried drums on-site during the initial phase of the removal. Those drums which appear to link your company to the site are shown in Attachment 3. Please recognize that this inventory represents a snapshot of what was on-site when the removal action commenced. Also, the inventory does not account for the fact that the company whose name appears on the drum did not necessarily send the drum to the site. If that is the case with your company, please have the proper party get in touch with the MPC by the means discussed below.

To give you some perspective, some 14,769 of the 31,555 drums bar coded showed company names, as did 2,958 of the 3,038 small drums, which were not bar-coded.

Other information sources exist concerning the Metro site. The extent to which these materials are used in allocation remains to be seen.

As you will note in Section XXIII of the Order, additional signatories are contemplated. The current signatories are planning to draft a reasonable method of allocating removal costs by the end of January, 1990. At this point an approach based upon drums sent to Metro is contemplated. A meeting to discuss the draft allocation is planned for late January or February. Please let us know by January 15 if you are interested in commenting on the draft allocation method.

Once an allocation has been finalized, you will again be contacted and asked to sign the Order. Those who sign on will receive contribution protection while those who do not risk cost recovery actions by the EPA and contribution actions by the signatories to the Order.

Present plans are to confine the allocation to costs incurred to date, which will encompass the MK contract, EPA oversight costs reimbursable under the Order, prior technical work, and group expenses. The total should be in the range of \$6 million. Future expenditures will not be covered because the need for additional work is uncertain.

Please direct inquiries to this office. Written communications will be appreciated. If you must call, the number of my secretary, Margo Lopez, is (215) 972-1960 and the number of the paralegal involved in this matter, Diane Reznik, is (215) 972-8685.

Thank you for your prompt attention to this matter.

Sincerely,

Carl B. Everett

CBE/mml Enclosures

cc: Metro PRP Committee

Attachment Z

09/20/89

METRO CONTAINER
YEARLY DRUM COUNTS FOR 1985, 1986, AND 1987

DRUMS SENT TO METRO

COMPANY NAME

FLIPPO'S OIL CO. 1985

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This packet does not contain Attachment 3.

# United S es Environmental Protection Agency

## Region III

In the Matter of:

Metro Container Corporation Site

BP Oil Inc., Arco Chemical Co., Mobil Oil Corp., Sun Refining and Marketing Co., and E.I. du Pont de Nemours & Co.,

Respondents

Proceeding under Sections 106(a) and 122 ) of the Comprehensive Environmental )
Response, Compensation, and Liability Act) of 1980 (42 U.S.C. Sections 9606(a) and )
9622, as amended by the Superfund Amend- ) ments and Reauthorization Act of 1986, )
Pub. L. No. 99-49, 100 Stat. 1613 (1986) )

Docket No: III-89-11-DC

HEREN CERTIFY THAT THE STATE ORIGINAL CALSCUT CALCULATION THE CALSCUT CALCULATION THE CALCULATION TO SERVICE AND THE CALCULA

## ADMINISTRATIVE ORDER ON CONSENT

The following Administrative Order on Consent ("Consent Order" or "Order") by and between the United States Environmental Protection Agency ("EPA") and Arco Chemical Company, BP Oil Inc., Mobil Corp., Sun Refining and Marketing Co., and E.I. du Pont de Nemours & Co. ("Respondents") is issued pursuant to the authority vested in the President of the United States of America by Sections 106(a) and 122 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), 42 U.S.C. 9606(a) and 9622, as amended by the Superfund Amendments and Reauthorization Act of 1986 ("SARA"), Pub. L. No. 99-499, 100 Stat. 1613 (1986), and delegated to the Administrator of EPA on January 23, 1987, by Executive Order 12580, 52 Fed. Reg. 19 (1987), and further delegated to the Regional Administrators of EPA. This Order pertains to a property more particularly described below, located in Trainer, Delaware County, Pennsylvania.

The actions taken pursuant to this Order shall be consistent with the National Oil and Hazardous Substances Contingency Plan ("NCP"), 40 C.F.R. 300.65. Notice of the issuance of this Order has been given to the Commonwealth of Pennsylvania pursuant to Section 106(a) of CERCLA, 42 U.S.C. 9606(a).

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## I.STATEMENT OF PURPOSE

In entering into this Consent Order, the mutual objectives of EPA and Respondents are to conduct a removal action, as defined in Section 101(23) of CERCLA, 42 U.S.C. 9601(23), to abate, mitigate, and/or eliminate the release or threat of release of hazardous substances at the Metro Container Corporation Site ("Site").

The specific purposes of this Order are to control access to the Site, perform the removal tasks described in the attached Scope of Work, and prevent further surface migration of hazardous substances into Stoney Creek. All parties anticipate that removal activities beyond the scope of this Order may be necessary and may be the subject of future negotiations.

## II. FINDINGS OF FACT

EPA has determined that:

- 1. The Metro Container Corporation ("Metro") Site, shown in Appendix 1, is located at West Second Street and Price Road in Trainer, Delaware County, Pennsylvania. Metro Container Corporation is a Delaware corporation doing business in the Commonwealth of Pennsylvania.
- 2. The Site, located in an industrial area, is bounded by an oil refinery to the west and a scrap yard to the east with railroad lines and the Delaware River to the south and residences to the north. Stoney Creek, a tributary to the Delaware River, borders the western edge of the Site.
- 3. The Site has been used for approximately 20 years as

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a recycling and reclaiming facility for used drums. Metro became the owner and operator of the Site on February 11, 1983.

- 4. During the course of operations, sludge was generated and accumulated at the Site in a concrete basin and in numerous used 55-gallon drums. Analysis of the sludge by EPA has revealed elevated levels of various metals and organic compounds.
- 5. On December 7, 1987, Metro filed for bankruptcy under Chapter 11 of the Bankruptcy Code. The company ceased operations at the Site on December 11, 1987.
- 6. EPA employees and contractors conducted an inspection of the Site on December 11, 1987. The inspection revealed an open cement lagoon containing waste sludge, numerous 55-gallon drums of waste sludge, and approximately 60,000 unreclaimed drums. The lagoon was filled beyond design capacity and was on the verge of overtopping its banks. Visual evidence was present that the lagoon had, in the past, overtopped its banks. Many of the drums containing sludge were in poor condition, uncovered, and appeared partially filled with rainwater. Sludge was also present on the ground in the vicinity of the sludge storage drums.
- 7. Samples were taken during the December 11, 1987, inspection. The sample locations are shown on the map in Appendix 1 which is attached hereto and made a part hereof. The results of the sampling are shown in the tables in Appendix 2 which are attached hereto and made a part hereof.
- 8. The substances listed in Appendix 2 are hazardous substances

as defined by Section 101(14) of CERCLA, 42 U.S.C. 9601(14).

- 9. The toxicological effects of the hazardous substances listed in Appendix 2 are presented in Appendix 3, attached hereto and made a part hereof.
- 10. Approximately 500 people live within a quarter mile of the Site. Potential routes of exposure to the hazardous substances identified in Appendix 2 include dermal contact, ingestion, or inhalation.
- 11. The Respondents are all corporations doing business in the Commonwealth of Pennsylvania who have each arranged for the disposal at the Site of residues of hazardous substances which, according to Metro, were contained in "RCRA empty" drums (40 C.F.R. Section 261.7).

#### III. CONCLUSIONS OF LAW

- 12. The Site is a "facility" as defined in Section 101(9) of CERCLA, 42 U.S.C. 9601(9).
- 13. Each Respondent is a "person" within the meaning of Section 101(21) of CERCLA, 42 U.S.C. 9601(21).
- 14. Hazardous substances as defined in Section 101(14) of CERCLA, 42 U.S.C. 9601(14), have been disposed of at the Site and are currently present there.
- 15. The past, present, and/or potential migration of hazardous substances at and/or from the Site constitutes an actual and/or threatened "release" as defined in Section 101(22) of CERCLA, 42 U.S.C. 9601(22).
- 16. Respondents and others are liable as responsible parties pursuant to Section 107(a) of CERCLA, 42 U.S.C. 9607(a).

## IV. <u>DETERMINATIONS</u>

- 17. Based upon the Findings of Fact and Conclusions of Law, the EPA Regional Administrator for Region III has determined that there may be an imminent and substantial endangerment to the public health, welfare, or the environment as a result of the release or threat of release of hazardous substances at and/or from the Site.
- 18. The Regional Administrator has determined that the actions set forth below are necessary to protect public health and welfare and the environment.

# V. PARTIES BOUND

- 19. This Consent Order shall apply to and be binding upon EPA and Respondents and their agents, successors, and assigns and upon all persons, contractors and consultants acting under or for the Respondents, or any combination thereof.
- 20. The undersigned representative of each Respondent certifies that he or she is fully authorized by the party he or she represents to enter into the terms and conditions of this Consent Order, to execute this Consent Order, and to bind legally such party to this Consent Order.
- 21. No change in ownership or corporate or partnership status relating to any Respondent will in any way alter the status of the Respondents or their responsibilities under this Consent Order.
- 22. The Respondents shall provide a copy of this Consent Order to all contractors, sub-contractors, laboratories, and

consultants retained to conduct any portion of the work performed pursuant to this Consent Order and shall condition such contracts upon compliance with the requirements of this Consent Order. Respondents shall provide appropriate oversight to ensure such compliance.

23. In the event of the refusal or inability to comply with all the terms and conditions of this Consent Order, or insolvency of any one or more of the Respondents, whether or not such Respondent(s) enters into formal bankruptcy proceedings, or if for any other reason one or more of the Respondents do not comply with any term or condition of this Consent Order, the remaining Respondents shall be obligated to the United States to complete full implementation of any and all remaining terms and conditions of this Order.

## VI. WORK TO BE PERFORMED

- 24. "Days" as used in this Order shall mean calendar days unless otherwise specified.
- 25. Within seven (7) days of the effective date of this Order, Respondents shall retain a qualified contractor or identify qualified employees who will develop the Work Plan described below in paragraph 26 and notify EPA in writing regarding the identity and qualifications of the person or persons who will be primarily responsible for developing the Work Plan.

Within seven (7) days of receipt of EPA approval of the Work Plan, Respondents shall retain a qualified contractor who will implement the Work Plan and notify EPA in writing

regarding the identity and qualifications of the person or persons who will be primarily responsible for carrying out the terms of the Work Plan.

EPA may disapprove the use of any supervisory personnel, contractor and/or subcontractor if EPA believes they are not qualified to develop the Work Plan or perform the response work. In the event of a disapproval, Respondents shall notify EPA in writing within seven (7) days of receipt of EPA's notice of disapproval of the person, contractor or subcontractor who will replace the one(s) whom EPA disapproved. EPA may not unreasonably disapprove Respondents' supervisory personnel, contractors and/or subcontractors.

Respondents reserve the right to replace any supervisory personnel, contractor or subcontractor subject to EPA's right to disapprove any replacement as provided above.

- 26. Within twenty-one (21) days of the effective date of this Order, Respondents shall submit to EPA a Work Plan which:
- a. provides for the completion of all tasks described in the Scope of Work attached hereto and made a part hereof as Appendix 4;
- b. contains a site safety program which is sufficient to minimize the potential for exposure of personnel and the public to hazardous substances during performance of the work specified therein;
- c. contains a schedule for the implementation of all tasks specified in the Work Plan. This schedule shall not exceed 180 days after approval of the Work Plan for the

page 9 DOCKET NO: III-89-11-DC achievement of all tasks specified in the Work Plan except for analysis of the post-removal samples, revegetation and submission of the final report.

- d. provides for EPA to receive notice at least 72 hours prior to the commencement of any tasks identified in the Work Plan.
- 27. EPA shall review the Work Plan submitted pursuant to paragraph 26. If EPA approves the Work Plan, Respondents shall begin implementation of the Work Plan in accordance with the requirements and schedules therein within 5 days of receipt of notification by EPA of its approval of the contractor who will implement the Work Plan. If EPA disapproves or conditionally approves the Work Plan, EPA will specify the deficiencies or conditions in writing. Respondents shall, within 7 days following receipt of a conditional approval, modify the Work Plan to satisfy the conditions and begin implementing the Work Plan as modified. Respondents shall, within 7 days following receipt of a disapproval, modify the Work Plan to remedy the specified deficiencies and resubmit the Plan to EPA. In the event of disapproval of the revised Work Plan, EPA retains the right to submit its own plan to the Respondents and to require the Respondents to perform the tasks set forth therein, or to perform the work itself and to seek to recover costs from the Respondents for such work pursuant to Section 107 of CERCLA, 42 U.S.C. 9607.
- 28. Respondents shall submit progress reports to EPA on a regular schedule which shall be specified in the Work Plan.

The progress reports shall, at a minimum, provide the dates that each task was initiated and completed, as well as all information developed and sample results obtained. Respondents shall provide any available information related to the Site cleanup specifically requested by EPA within 3 business days of receipt of the request. Within 45 days after completing the work required by this Order, the Respondents shall submit to EPA a final report detailing activities completed and data gathered.

- 29. Respondents and EPA or their designees shall arrange a final inspection of the Site following completion of the tasks described in the Work Plan to verify compliance with the requirements of this Order. EPA shall subsequently notify the Respondents of its determination of satisfactory compliance with the terms of the Order, or in the event that EPA determines that compliance is not satisfactory, EPA shall specify the deficiencies and the actions required to correct such deficiencies. The Respondents will undertake the actions required to correct such deficiencies within fourteen (14) days of receipt of EPA's notice of disapproval.
- 30. Respondents shall comply with all applicable Federal,
  State, and local statutes, regulations, and ordinances
  when carrying out activities required pursuant to this Order.
- 31. All work must be performed in accordance with the Occupational Safety and Health Administration's rules and regulations governing hazardous waste operations, 29 C.F.R. Part 1910.

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#### VII. DESIGNATED PROJECT OFFICERS

32. On or before the effective date of this Consent Order, EPA and Respondents shall each designate a Project Officer ("PO"). Each PO shall be responsible for overseeing the implementation of this Order. To the maximum extent possible. communications between the Respondents and EPA and all documents, including reports, approvals, and other correspondence concerning the activities performed pursuant to the terms and conditions of this Order, shall be directed through the Project Officers. EPA and the Respondents each have the right to change their respective PO. Such a change shall be accomplished by notifying the other party in writing at least five (5) days prior to the change. The EPA PO's authority shall include the authority to halt, modify, conduct, or direct any tasks required by this Consent Order or portions thereof or to take any response actions when conditions present an immediate risk to public health or welfare or the environment as described in 40 C.F.R. 300.65. The PO's actions shall, at all times, be controlled by the guidance and authority of the National Contingency Plan, 40 C.F.R. Part 300. The PO for EPA shall be:

> Karen M. Wolper, Chief CERCLA Removal Enforcement Section (3HW13) United States Environmental Protection Agency 841 Chestnut Building Philadelphia, PA 19107 Telephone: (215) 597-8981.

The absence of the EPA PO from the Site shall not be a cause for the stoppage of work.

## VIII. SAMPLING AND ACCESS

- 33. At the request of EPA, Respondents shall allow split or duplicate samples to be taken by EPA and/or its authorized representatives of any samples collected by Respondents pursuant to the implementation of this Order. Respondents shall notify EPA not less than seventy-two (72) hours in advance of any sample collection activity.
- In addition to its authority under Section 104 of CERCLA, 42 U.S.C. 9604, EPA and its authorized representatives shall have the authority to enter and freely move about the Site at all reasonable times for the purpose of, inter alia: inspecting records, operating logs, and contracts relating to the Site; reviewing the progress of the Respondents in carrying out the terms of this Order; conducting such sampling and tests as EPA deems necessary; and verifying the data submitted to EPA by the Respondents. To the extent practicable, EPA shall coordinate its on-site activities with the Respondents' Project Officer. The Respondents shall permit EPA and its authorized representatives to inspect and copy all records, files, photographs, documents, and other writings, including all sampling and monitoring data, which in any way pertains to work undertaken pursuant to this Order, provided however, that nothing herein shall constitute a waiver of documents protected by the attorney-client privilege or the attorney work-product doctrine. EPA reserves such rights as it may have to seek access to such documents and if Respondents withhold such documents they shall provide to EPA an index of

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the documents withheld and a statement supporting the claim of privilege or workproduct.

- 35. All parties with access to the Site pursuant to this paragraph shall comply with all EPA-approved health and safety plans.
- 36. To the extent that property included in the sampling and removal area is owned or controlled by parties other than the Respondents, the Respondents will use all reasonable efforts to obtain access agreements from the present owners and/or lessees, as appropriate, within twenty (20) days of the effective date of this Order. Such agreements shall provide reasonable access for EPA, Respondents, and their authorized representatives. In the event the Respondents cannot obtain such access agreements within the time designated above, Respondents shall so notify EPA of such failure and the actions taken to obtain access no later than the close of the 20-day period.

## IX. EFFECTIVE DATE AND SUBSEQUENT MODIFICATION

- 37. The effective date of this Order shall be the date on which a fully executed copy is received by the Respondents.
- 38. This Order may be amended by mutual agreement of EPA and the Respondents. Such amendments shall be in writing and shall become effective on the date on which a fully executed copy of such amendments are received by the Respondents. Minor changes to the Work Plan and the schedule contained therein may be made by mutual agreement of EPA's and Respondents' POs. Such changes shall become effective at the time of agreement and shall be confirmed by EPA within 5 days by letter.

39. Any reports, plans, specifications, schedules, or other submissions required by this Consent Order, with the exception of site access agreements between the Respondents and third parties, are, upon approval by EPA, incorporated into this Consent Order. Any non-compliance with such EPA-approved reports, plans, specifications, schedules, or other submissions shall be considered non-compliance with the requirements of this Consent Order and will subject the Respondents to the requirements of Section XIII "Stipulated Penalties".

40. No informal advice, guidance, suggestions, or comments by EPA regarding reports, plans, specifications, schedules, and other writing(s) submitted by the Respondents shall be construed as relieving the Respondents of their obligation to obtain formal approval when required by this Order.

## X. QUALITY ASSURANCE

41. The Respondents shall use quality assurance, quality control, and chain of custody procedures in accordance with the "EPA NEIC Policies and Procedures Manual" dated May 1978, revised November 1984, EPA Document 330/9-78-001-R, "Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans," December 1980, QAMS-005/86, and "A Compendium of Superfund Field Operations Methods", December 1987, OSWER Directive 9355-0-14 while conducting all sample collection and analysis activities required by this Order. The Respondents shall consult with EPA in planning for, and prior to, all sampling and analysis required by this Order or the approved Work Plan.

## XI. FORCE MAJEURE

42. The Respondents shall notify EPA of any delay or anticipated delay in achieving compliance with the requirements of this Order. Said notification shall be made verbally as soon as possible but not later than two (2) business days after the Respondents become aware of such delay or anticipated delay, and in writing not later than five (5) calendar days after becoming aware of such delay or anticipated delay. The written notification shall state:

(a) the nature of the delay; (b) whether and the reason why the delay is beyond the control of the Respondents; (c) the action that has been and will be taken to mitigate, prevent or minimize further delay; (d) the anticipated length of the delay; and (e) a timetable for the action to mitigate, prevent or minimize the delay. The Respondents shall adopt all reasonable measures to avoid or minimize any such delay.

Any delay that results from circumstances beyond the control of the Respondents that cannot be overcome by due diligence shall not be deemed to be a violation of the Respondents' obligations under this Order, nor shall it make the Respondents liable for penalties pursuant to this Order resulting from such a delay. To the extent a delay is caused by circumstances beyond the control of the Respondents and cannot be overcome by due diligence, the schedule affected by the delay shall be modified to account for the delay resulting from such circumstances. Increased costs of performance or changed economic circumstances shall not be considered

circumstances beyond the control of the Respondents.

Failure of the Respondents to comply with the notice requirements of this Section XI shall render this Section XI void and constitute a waiver of the Respondents' right to invoke the benefits of this Section XI with regard to such incident.

In the event that EPA and the Respondents cannot agree that any delay in compliance with the requirements of this Order has been or will be caused by circumstances beyond the reasonable control of the Respondents that cannot be overcome by due diligence, the dispute shall be resolved in accordance with the provisions of the "Dispute Resolution" section, Section XII, of this Order. The Respondents shall have the burden of proving that the delay was caused by circumstances beyond their control which could not have been overcome by the exercise of due diligence, the necessity of the proposed length of the delay, and that the Respondents took all measures to avoid or minimize delay.

#### XII. DISPUTE RESOLUTION

43. If the Respondents object to any EPA notification of deficiency, disapproval, or other EPA action taken pursuant to this Order, the Respondents shall notify EPA in writing of their objection(s) within fourteen (14) days of receipt of such notification or action. EPA and the Respondents shall have an additional fourteen (14) days from the receipt by EPA of the notification of objection from the Respondents to reach agreement. If agreement cannot be reached on any issue within this fourteen (14) day period, EPA shall provide a

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proposed written statement of its decision to the Respondents.

Respondents shall then have 7 days to comment on EPA's proposed decision. After review of Respondents' comments, EPA shall issue a written statement of its decision to the Respondents.

#### XIII. STIPULATED PENALTIES

44. If the Respondents fail to perform any work or submit any reports set forth in this Order or the Work Plan, in the manner and in accordance with the schedule contained therein, the Respondents shall pay into the Hazardous Substances Superfund, within thirty (30) calendar days of receipt of written demand by EPA, the sums set forth below as stipulated penalties. Checks shall specifically reference "The Metro Container Corporation Site" and shall be made payable to the Hazardous Substances Superfund and shall be mailed to:

U.S. Environmental Protection Agency Superfund Accounting P.O. Box 360515M Pittsburgh, PA 15251

A copy of the check and transmittal letter shall be sent to the EPA PO and to the EPA Regional Hearing Clerk (3RC00), EPA Region III, 841 Chestnut Bldg., Philadelphia PA, 19107. Stipulated penalties shall accrue in the amount of \$1,000 per day for the first week or any portion thereof, \$2,000 per day for the next three (3) weeks thereafter or any portion thereof and \$5,000 per day for each week thereafter or any portion thereof during which a violation continues to occur. The stipulated penalties set forth in this Section XIII do not

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preclude EPA from pursuing any other remedies or sanctions available to EPA by reason of the Respondents' failure to comply with any of the requirements of this Order. The collection of stipulated penalties for a violation shall be stayed during the pendency of any dispute resolution proceeding concerning such violation under Section XII hereof, except that said penalties shall continue to accrue during this period of time. Upon conclusion of the Dispute Resolution procedures set forth under Section XII, payment of all accrued stipulated penalties shall be due within fourteen (14) calendar days of Respondents' receipt of EPA's written decision. 45. In the event that EPA commences all or a portion of the removal action described by this Consent Order, Respondents shall be released from any further obligation under this Consent Order to complete that portion of the removal action which EPA has commenced to perform. EPA's commencement of all or a portion of the removal action shall not relieve Respondents of any outstanding obligations to pay stipulated penalties for violations of this Consent Order. Stipulated penalties for violations of this Consent Order which have not been corrected as of the date of EPA's commencement of all or a portion of the removal action and which are uncorrectable because of EPA's commencement shall continue to accrue for a period not to exceed 60 days after EPA commences all or a portion of the removal action.

# XIV. STATUTORY PENALTIES

46. The Respondents are advised that willful violation or

failure or refusal to comply with this Order, or any portion hereof, may subject the Respondents to a civil penalty of not more than \$25,000 for each day in which such violation occurs or such failure to comply continues, in accordance with Section 106(b) of CERCLA, 42 U.S.C. 9606(b). Failure to comply with the Order, or any portion thereof, without sufficient cause, may also subject the Respondents to liability for punitive damages in an amount of up to three times the amount of any costs incurred by the "Fund", as defined in Section 101(11) of CERCLA, 42 U.S.C. 9601(11), as a result of such failure to take proper action, in accordance with Section 107(c)(3) of CERCLA, 42 U.S.C. 9607(c)(3).

## XV. RESERVATION OF RIGHTS

- 47. Except as expressly provided in this Order, (1) each party reserves all rights and defenses it may have, and (2) nothing herein shall prevent EPA from seeking legal or equitable relief to enforce the terms of this Order, including the right to seek injunctive relief and the imposition of statutory penalties.
- 48. As provided by this Order, EPA expressly reserves its right to disapprove of work performed by the Respondents and reserves its right to request that the Respondents perform response actions in addition to those required by this Order if it determines that such actions are necessary. In the event that the Respondents decline to perform such additional actions, EPA reserves the right to (a) order the Respondents to perform the additional work under Section 106 of CERCLA,

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42 U.S.C. Section 9606, and/or (b) undertake such actions and seek reimbursement for costs incurred pursuant to Section 107 of CERCLA, 42 U.S.C. 9607. In addition, EPA reserves the right to undertake removal and/or remedial actions at any time that such actions are appropriate under the NCP and seek reimbursement for any costs incurred pursuant to Section 107 of CERCLA, 42 U.S.C. 9607.

## XVI. OTHER CLAIMS

- 49. Nothing in this Order shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership, or corporation not bound by this Order for any liability it may have arising out of or relating in any way to the generation, storage, treatment, handling, transportation, release, or disposal of any hazardous substances, hazardous wastes, pollutants, or contaminants found at, taken to, or taken from the Site.
- 50. Each Respondent hereby waives any claim to reimbursement it may have under Section 106(b) of CERCLA, 42 U.S.C. 9606(b).
- 51. This Order does not constitute any decision on preauthorization of funds under Section 111(a)(2) of CERCLA, 42
  U.S.C. 9611(a)(2).

## XVII. CONSENT

52. The Respondents agree to undertake all actions required by the terms and conditions of this Order, but do not otherwise commit to undertake any other action hereby. The

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Respondents consent to and will not contest EPA jurisdiction regarding this Order.

53. Each Respondent agrees to pay its own costs and attorney's fees.

## XVIII. REIMBURSEMENT OF PAST RESPONSE COSTS

- 54. For purposes of this Consent Order, the term "past response costs" shall mean all response costs incurred by EPA in connection with response activities relating to the Site pursuant CERCLA and the NCP as of the effective date of this Consent Order.
- 55. Within 90 days of the effective date of this Consent Order EPA shall submit to Respondents (a) an accounting of past response costs; (b) a count of all drums received at the Site during the period January 1, 1985 through and including December 31, 1987, and (c) a count of all drums received at the Site during the period January 1, 1985 through and including December 31, 1987 attributable to each Respondent. For purposes of this Consent Order each Respondent's "proportionate share" of past response costs shall be equal to the percentage of drums attributable to such Respondent during the above mentioned period.
- 56. Within 90 days of Respondents' receipt of the information provided by EPA pursuant to paragraph 55 above, Respondents shall reimburse EPA for past response costs in an amount equal to ten percent (10%) more than Respondents' total proportionate share.
- 57. Any Respondent executing this Order after the effective

date of this Order as provided in Section XXIV herein shall reimburse EPA for past response costs in an amount equal to ten percent (10%) more than its proportionate share. Any such Respondent shall reimburse EPA said amount within 60 days of its execution of this Consent Order.

- 58. In the event EPA is reimbursed for more than one hundred percent (100%) of past response costs excluding interest payments, the excess shall be applied to offset Respondents' cost reimbursement obligations set forth in Section XIX immediately below.
- 59. Payments made pursuant to this Section XVIII shall be made payable to the "Hazardous Substances Superfund", should specifically reference the "Metro Container Corporation Superfund Site" and should be addressed as specified in Section XIII of this Consent Order. Copies of the check and transmittal letter shall be sent to the EPA PO and to the EPA Regional Hearing Clerk (3RC00), EPA Region III, 841 Chestnut Building, Philadelphia, PA 19107.

# XIX. REIMBURSEMENT OF COSTS INCURRED WITH RESPECT TO THIS CONSENT ORDER

60. At the termination of this Consent Order, EPA shall submit to the Respondents an accounting of all response and oversight costs paid by the U.S. Government with respect to this Consent Order. Oversight costs shall consist of all costs paid by EPA, its agents or contractors in connection with EPA's oversight of the work to be done by the Respondents under the terms of this Consent Order. The Respondents shall,

within thirty (30) calendar days of receipt of that accounting, remit a check for the amount of those costs made payable to the Hazardous Substances Superfund. Checks should specifically reference the Site and be addressed as specified in Section XIII of this Order. Copies of the check and transmittal letter shall be sent to the EPA PO and to the EPA Regional Hearing Clerk (3RC00), EPA Region III, 841 Chestnut Building, Philadelphia, PA 19107.

# XX. TERMINATION AND SATISFACTION

61. The provisions of this Order shall be deemed satisfied upon Respondents' receipt of written notice from EPA that all of the terms of this Consent Order have been adequately completed to EPA's satisfaction. Respondents may request such a notice from EPA following submission of the final report. Such notice shall not be unreasonably withheld. Notice from EPA as provided in this Section shall constitute a finding that the work has been completed in a manner consistent with the NCP. EPA reserves its right to alter this finding based on information not available at the time this finding was made.

## XXI. ADMISSIONS

62. Nothing in this Consent Order, including the Work Plan identified in Section VI hereof, is intended by the parties to be, nor shall it be, an admission of facts or law or determinations, an estoppel, or a waiver of defenses by the Respondents for any purpose, other than the enforcement of this Consent Order, and the Respondents specifically do not

admit any matter of fact or law set forth herein including that the conditions at the Metro Container Corporation Site present an imminent and substantial endangerment to public health, welfare, or the environment, or that such conditions constitute a release or threat of a release of hazardous substances. Participation in this Consent Order by the Respondents is not intended by the parties to be, and shall not be, an admission of any fact or opinion developed by the contractor in the completion of the work. The terms of this Consent Order, including the Work Plan, shall not be construed more or less favorably for or against any party hereto. This Consent Order shall not be admissible in any proceeding except to enforce the terms of this Order.

## XXII. SUBORDINATION OF CLAIMS

63. Any claim which any Respondent may have against any person (other than any other Respondent) for contribution for monies paid to EPA pursuant to this Consent Order as reimbursement for past response costs (as defined herein) shall be subordinated to any claim which EPA may have against such other person for recovery of any such past response costs not paid or payable by Respondents pursuant to this Consent Order.

The term "past response costs" as used in this paragraph 63 shall mean all response costs incurred by EPA in connection with response activities relating to the Site pursuant to CERCLA and the NCP as of the effective date of this Consent Order.

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## XXIII. ADDITIONAL RESPONDENTS

- The parties understand that this Order may be 64. amended by the inclusion of additional Respondents after the effective date of this Consent Order. Such amendment shall be accomplished by submission of a signature page executed by the additional Respondent(s) and a representative of the original Respondents to the EPA representative listed in paragraph 32 of Section VII of this Order, and shall become effective upon Respondent's receipt of a letter from EPA acknowledging receipt of the new signature page and a revised caption listing the additional Respondent(s). Respondents included after the effective date of this Consent Order as provided by paragraph 64 immediately above shall become immediately subject to all the terms and conditions of this Consent Order including, but not limited to, the obligation to pay for past response costs as provided by paragraph 57
- 66. For purposes of this Consent Order, the term "original Respondents" means Arco Chemical Company, BP Oil Inc.,

of Section XVIII of this Order.

Mobil Oil Corp., Sun Refining and Marketing Co., and E.I. du Pont de Nemours & Co.

DOCKET NO: III-89-11-DC

# IT IS SO AGREED AND ORDERED:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: 6-16-87

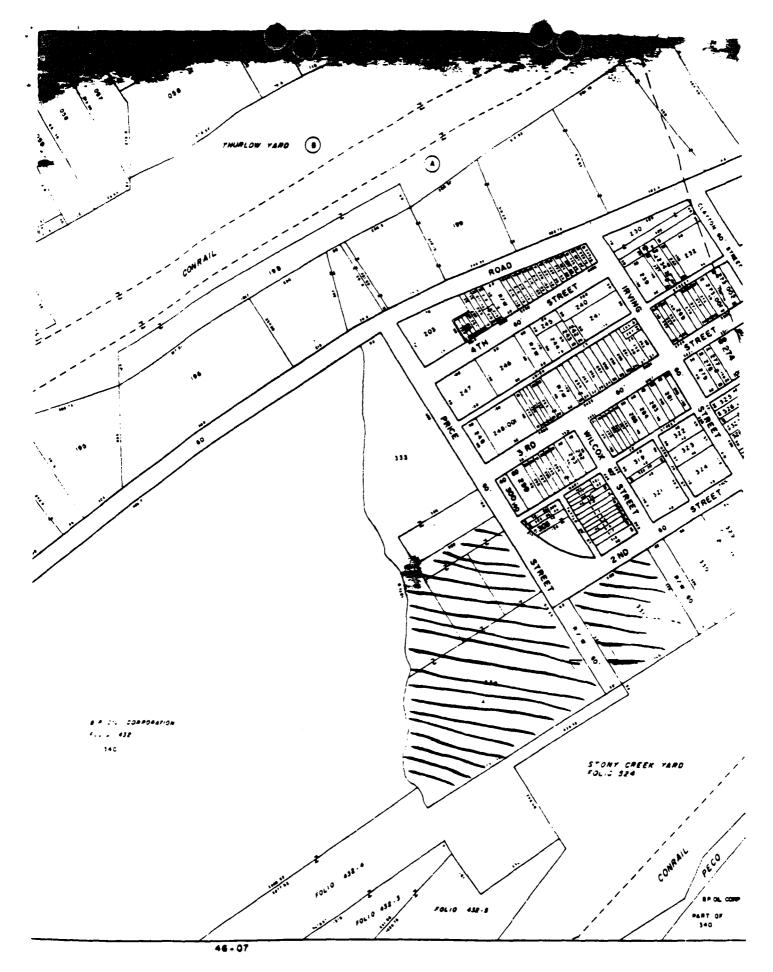
BY: PCTONAL ADMINISTRA

REGIONAL ADMINISTRATOR EPA, REGION III

DOCKET NO: III-89-11-DC

Appendix 1

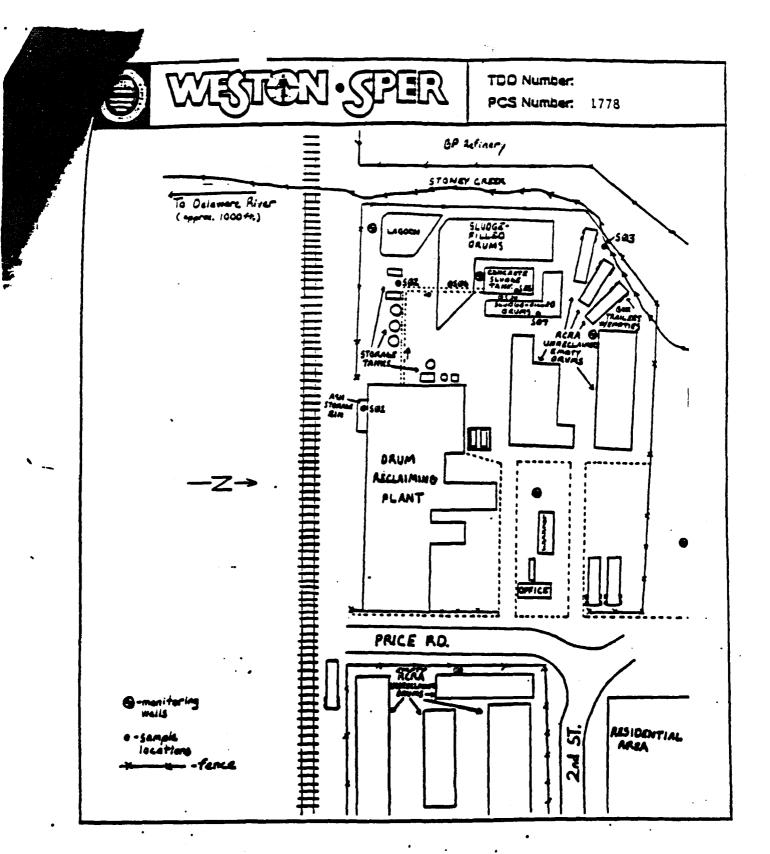
SITE MAPS



ARE COUNTY BOARD OF ASSESSMENT APPEALS

SCALE | - 200'

Delaware County - Trainer Borough



Metro Container Corporation Site Sketch . 12/29/87

Not to Scale

DOCKET NO: III-89-11-DC

Appendix 2

ANALYTICAL DATA

### Table 1-Metro Container, Emergency Assessment Sampling Results

### Sample SOl- Ash pile south of Treatment Plant

Metals	Concentration (ppm)		
Barium	2.47		
Cadmium	0.91		
Chromium	0.49		
Lead	19.00		
Pesticides/herbicides	Less than detection limits		
Corrosivity (pH)	8.55		
Ignitable	No		
Reactive-HCN	No		
H2S	No		

#### Sample SO2- Liquid/sludge, east of hydrochloric acid tanks

Metals	Concentration (ppm)
Copper	16.18
Lead	82.70
Zinc	88.50
Cyanide	1.36
Total Phenolics	6 <b>.76</b>
<u>Volatiles</u>	Concentration (ppb)
Methylene Chloride	12,000
1,2-dichloroethane	37,000
l,l,l-trichloroethane	35,000 ·
Carbon tetrachloride	5,300
Trichloroethylene	7,700
Tetrachloroethylene	6,600
Toluene	93,000
Base Neutrals	
1,2-dichlorobensene	18,000
naphthalene	120,000
di-n-butyl phthalate	94,000
butyl benzyl phthalate	140,000
bis (2-ethyl hexy) phthalate	660,000
Acid Extractables	Not detected

Pesticides/PCB's

Not detected

#### Table 1 cont'd

#### Sample S03- Liquid, former discharge point into Stoney Creek

<del>-</del> .	Concentration (ppm)
Metals	Not detected
Cyanide	Not tested
Total phenolics	Not tested
Volatiles and base neutrals	Not tested
Acid Extractables	Not tested
Pesticides/PCB's	Not tested

#### Sample S04- Sludge-leaking drum area east of lagoon

Concentration (ppm)

	Not detected	
Volatile organics	Concentration (ppb)	
Methylene Chloride	270	
Toluene	3	
2-propanone (tentative)	22	

#### Base Neutrals

Metals

bis (2-ethyl hexyl) phthalate 9	970
---------------------------------	-----

Acid Extractables Not detected

Pesticides/PCB's Not detected

#### able 1-cont'd

Phenol

### *Sample SO5- Sludge, cement lagoon

Metals	Concentration (ppm)
Cadmium	7.18
Chromium	51.80
Copper	31.30
Lead	319.00
Mercury	0.20
Nickel	9.60
Zinc	228.00
Cyanide	2.02
Total phenolics	13.90
Volatile organics	Concentration (ppb)
Methylene chloride	8,500
1,2-dichloroethane	5,100
1,1,1-trichloroethane	19,000
Carbon tetrachloride	2,100
Trichloroethylene	4,300
Tetrachloroethylene	22,000
Toluene	180,000
Base Neutrals	
1,2-dichlorobenzene	67,000
naphthalene	98,000
di-n-butyl phthalate	150,000
bis(2-ethyl hexyl) phthalate	850,0 <b>00</b>
Acid Extractables	

Pesticides/PCB's Not detected

*Note: This sample is currently being tested for flashpoint

29,000

### ie i-cont'd

### *Sample SO6- Drum sludge, south of lagoon

Metals	Concentration (ppm)
Arsenic	0.93
Cadmium	3.57
Chromium	24.30
Copper	36.50
Lead	345.00
Mercury	0.63
Nickel	11.20
Zinc	549.00
Cyanide	37.40
Total phenolics	14.50
Volatile organics	Concentration (ppb)
Methylene chloride	1,300
1,2-dichloroethane	1,900
1,1,1-trichloroethane	470

Volatile organics	Concentration (ppb)
Methylene chloride	1,300
1,2-dichloroethane	1,900
1,1,1-trichloroethane	470
Trichlorosthylens	320
Tetrachloroethylene	410
Toluene	9,500
Ethyl benzene	2,000
Base Neutrals	
Naphthalene	48,000
di-n-butyl phthalate	52,000

Acid Extractables Not detected

Pesticides/PCB's Not detected

#### & 1-cont'd

Pesticides/PCB's

### *Sample S07- Drum sludge, east of lagoon

Metals	Concentration (ppm)
Copper	1.83
Lead	7.70
Mercury	0.06
Zinc	6.72
	••••
Cyanide	2.21
•	
Total phenolics	12.00
Volatile organics	Concentration (ppb)
Methylene chloride	1,600
1,2-dichloroethane	1,900
1,1,1-trichloroethane	540
Trichloroethylene	200
Tetrachloroethylene	190
Toluene	6,900
Ethyl benzene	860
Butane (tentative)	1,100
Base Neutrals	
1,2-dichlorobenzene	79
Isophorone	5,100
Naphthalene	1,100
di-n-butyl phthalate	<b>330</b>
bis (2-ethyl hexyl) phthalate	1,400
And d Empanyables	
Acid Extractables	17 000
Phenol	17,000
2,4-dimethylphenol	830

Not detected .

DOCKET NO: III-89-11-DC

Appendix 3
HEALTH DATA

#### Carbon Tetrachloride; CASRN 56-23-5

EPA considers carbon tetrachloride a B2 probable human carcinogen. This means that the Agency has high-quality information that this chemical causes cancer in animals, but that human data are limited or lacking. Carbon tetrachloride has produced liver cancers in all animal species evaluated, including rats, mice, and hamsters. The cancer-causing mechanism appears to be cell death and regeneration, leading to development of the same tumor type in all species studied. There have been three case reports of liver tumors developing in humans exposed to carbon tetrachloride. Several studies of workers who may have used carbon tetrachloride have suggested that these workers may have an excess risk of cancer.

The target organ for non-cancer effects is also the liver. Carbon tetrachloride exposure to animals results in liver lesions, as evidenced by mild centrilobular vacuolization, significant changes in serum enzyme levels, and liver cell death. Reported non-cancer effects in humans who inhaled carbon tetrachloride include severely restricted visual fields, reduced corneal sensitivity, and changes in several blood parameters. Available evidence suggests that use of alcohol and barbiturates exacerbates the toxic effects of carbon tetrachloride.

#### Dichloromethane (DCM, methylene chloride); CASRN 75-09-2

EPA considers DCM a B2 probable human carcinogen. This means the Agency has high-quality evidence that this chemical causes cancer in animals, but that human data are limited or lacking. Several animal species exposed to DCM orally and by inhalation showed increased incidence of lung, liver, mammary, and salivary cancers. DCM also causes mutations in bacteria, mitotic recombination in yeast cells, and transformation of rat embryo cells. Human data for DCM are not adequate to evaluate carcinogenicity. Neither of two available studies of chemical factory workers exposed to DCM showed an excess of cancers. However, the effectiveness of these studies was limited by low exposures and short study periods.

Humans who inhaled DCM experienced decreased visual and auditory functions and impaired psychomotor skills. Primates exposed to higher doses suffered decreased blood pressure and increased heart rate, depression, anesthesia, coma, and death. Non-cancer effects in long-term animal studies include liver and kidney effects, such as vacuolization and fatty changes in liver cells and kidney tubule degeneration.

DCM is readily absorbed through the lungs and gastrointestinal tract. Dermal absorption also occurs, but at a slower rate.

Lead: CASRN 7439-92-1

Lead is an environmental contaminant of great concern. Humans are exposed to lead by primarily by inhalation and ingestion, and to a lesser extent by dermal absorption. Inhaled lead is mostly absorbed through the lungs. Humans ingest lead in food and beverages, and by swallowing lead cleared from the lungs. Children receive additional lead exposure by ingesting dirt, dust, and paint chips.

The toxic effects in humans of greatest concern are neurological damage, decreased IQ, elevated hearing threshold, and retarded growth in children, and elevation of blood pressure in middle-aged men. Similar effects have been observed in animal studies. By comparison to other environmental toxicants, uncertainty about the health effects of lead is low. It appears that some of these effects, particularly changes in the levels of certain blood enzymes and in aspects of children's neurobehavioral development, may occur at blood lead levels so low as to be essentially without a threshold.

EPA also considers lead a B2 probable human carcinogen. This means the Agency has high-quality evidence that lead causes cancer in animals, but that human data are limited or lacking. Ten rat studies and one mouse study have shown statistically significant increases in kidney tumors with dietary and subcutaneous exposure to soluble lead salts. These results have been reproduced in several laboratories, and in multiple rat strains. Lead compounds are also capable of inducing chromosomal aberrations in vivo and in tissue cultures. Lead has been shown, in a number of DNA structure and function assays, to affect the molecular processes associated with the regulation of gene expression.

Of four human cancer studies, one reported increased stomach and lung cancer, two found no increase in cancer rate, and one reported a decrease. All four studies were compromised by lack of doses and information on smoking, and concurrent exposure to other metals such as arsenic, cadmium, and zinc. The available human evidence is considered inadequate.

#### Tetrachloroethylene (perchloroethylene, PCE); CASRN 127-18-4

EPA considers PCE a Class B2 probable human carcinogen. This means the Agency has some information suggesting PCE causes cancer in animals, but that human data are limited or lacking. Long-term PCE inhalation studies with animals produced leukemia in rats and liver cancer in mice; oral exposure also produced liver cancer in mice. Human cancer data suggest an increased cancer rate with PCE exposure, but studies are compromised by exposure to other chemicals. EPA is presently considering downgrading PCE to Class C (possible human carcinogen) based on the weakness of the evidence.

Non-cancer effects caused by PCE in animals include neurological depression, increased liver weight/body weight ratios, decreased body weight, increased liver triglycerides, decreased DNA content of cells, altered liver enzyme activity, necrosis, degeneration and polyploidy. The only toxic effect documented in humans is olfactory desensitization.

#### Trichloroethylene (TCE); CASRN 79-01-6

EPA considers TCE a Class B2 probable human carcinogen. This means the Agency has high-quality evidence that this chemical causes cancer in animals, but that human data are limited or lacking. The classification is based on tumors reported in two strains of mice exposed to TCE by two routes, and in in male rats exposed orally. Of five available human studies, four found no excess cancer risk associated with trichloroethylene exposure. The fifth study reported an association between TCE exposure and malignant lymphoma, but the study had various limitations. TCE produces mutations and unscheduled DNA synthesis in bacteria and mouse cells, evidence which supports the B2 classification.

TCE also affects bone marrow, central nervous system, liver, and kidney in animals and humans. Non-cancer effects include narcosis, enlargement of liver and kidney with accompanying enzyme changes, depressed heme synthesis, and immunosuppression.

Inhaled or ingested TCE is readily absorbed, but TCE is poorly absorbed through the skin.

Appendix 4

SCOPE OF WORK

#### METRO CONTAINER

#### SCOPE OF WORK

The tasks set forth below are intended to address those aspects of the Metro Container site which represent a threat to public health by way of direct contact. Groundwater considerations are addressed to the extent that surface activities remove the potential for contamination. As used throughout this Scope of Work, the terms "disposal" and "dispose" refer to removal from the site and disposal in accordance with applicable federal and state regulations.

The proposed tasks are as follows:

- 1. Drain the concrete tank (lagoon) and secondary containment area around the tank of all waste materials and cut and plug all piping and drain connections to the tank. Clean the tank and line with an impervious membrane. Fill the tank with an appropriate material (soil, sand, etc.), cap with clay and/or an impervious membrane, and cover with top soil and vegetation. Dispose of all liquids and sludges.
- 2. All drums on site will be visually inspected to determine both the nature and composition of the contents. This includes both the drums which are currently assumed to contain waste sludges and those assumed to be empty. This also includes all the drums in the drum recycling plant and loading dock, which will be relocated from the building to the west

side of the property and handled in the same manner as the other drums currently on the site.

All RCRA empty drums, determined by the visual inspection, will be removed from the site and property disposed or recycled.

Those drums which contain waste materials will be sampled using a statistically based random sampling plan. The samples will be analyzed for screening parameters to determine the nature of the waste, hazardous characteristics and compatibility for bulking. Compatible materials will be bulked, and all wastes and drums will be disposed.

3. All of the storage tanks and roll-off containers on site will be sampled and the contents analyzed for screening parameters. Compatible materials from the tanks will be bulked, and all materials will be disposed or recycled. The tanks will be emptied, cleaned, dismantled and removed from the site for disposal or recycling. Any rinsate generated will be disposed. The roll-off containers will be removed for disposal of their contents. The storage tanks include both those tanks containing sludge and those containing the raw materials for the drum cleaning process (acid, caustic, fuel oil, etc.).

- 4. The insulation on all externally insulated tanks will be sampled and analyzed for asbestos. Any insulation containing asbestos will be properly removed and disposed.
- 5. All pooled liquids in the tank containment areas and in the drum storage areas will be disposed.
- 6. All visibly contaminated or stained soil will be scraped and disposed. EPA will confirm the extent of contaminated soil by visual inspection. To prevent erosion and runoff, the remaining soil will be graded and topped with an appropriate cover material (e.g., vegetation).
- 7. After the grading is complete but before vegetation, the following sampling will be performed:

Composite samples. Ten composite surface samples will be collected and sent to a qualified contractor laboratory and analyzed for arsenic, lead, chromium, zinc and acid extractable organics. The grid on the attached site map shows the approximate location of the ten composite samples.

Core samples. Three core borings to a maximum depth of 3 feet will be obtained. The approximate locations of the three core borings have been identified with an "*" on the attached site map. These core borings will be sent to the

same laboratory as the composite samples and will be analyzed for purgible volatile organics in addition to the analyses performed on the composite samples.

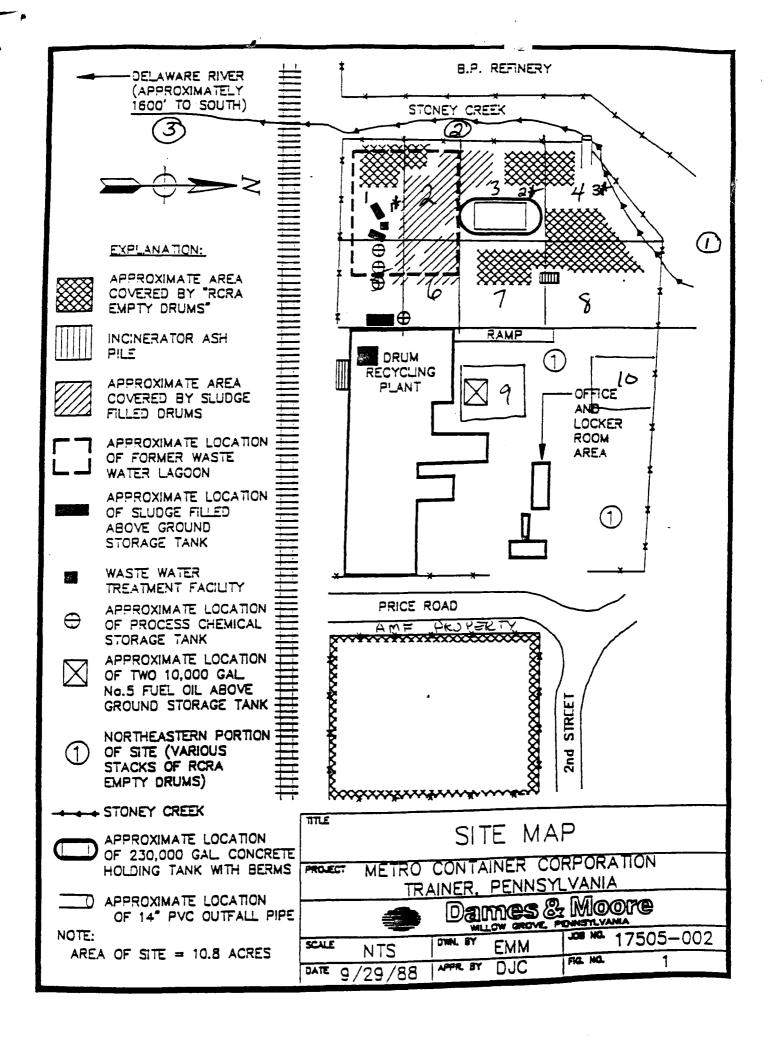
Stream samples. Three samples will be taken from Stoney

Creek. The approximate sample locations have been identi
fied on the attached site map with a circled number. The

stream samples will consist of a water and a sediment sample.

These six stream samples will be sent to the same laboratory

and analyzed for the same parameters as the core samples.



RECEIVED LEGAL DEPT. F 02 1990

A. C. EPPS ANDREW J. BRENT R. HARVEY CHAPPELL, JR. JOHN C. KENNY ALEXANDER WELLFORD JOHN C. KENNY
ALEXANDER WELLFORD
MICHAEL L. SOFFIN
DELMAN H. EURE
CARL F. BOWMER
JAMES EDWARD BETTS
C. DANIEL STEVENS
HULLIHEN W. MOORE
MICHAEL W. SMITH
STEPHEN R. LARSON
PAUL G. TURNER
DAVID D. REDMOND
JAMES W. TREDWAY, III
AUGUSTUS C. EPPS, JR.
WALLER R. STAPLES, III
DAVID I. GREENBERG
WILLIAM J. NEWMAN, JR.
DENNIS O. LAING
DOUGLAS R. MAXWELL
PETER E. BROADBENT, JR.
PAUL W. JACOBS, II
ROBERT ALFRED GOULDIN
MARY METIL GROVE
LOUIS R. MONACELL
DAVID C. KOHLER
WARREN DAVID HARLESS
ORRAN LEE BROWN

#### CHRISTIAN, BARTON, EPPS, BRENT & CHAPPELL

IZOO MUTUAL BUILDING 909 EAST MAIN STREET RICHMOND, VIRGINIA 23219-3095

> TELEPHONE 804 - 644 - 7851 CABLE ADDRESS "BARPAR" FACSIMILE 804 - 697 - 4112

January 29, 1990

ANDREW D. CHRISTIAN (1892-1947)

ALEXANDER W. PARKER

ROBERT T. BARTON, JR. (1891-1980)

COUNSEL
BROCKENBROUGH LAMB, JR.
GARTH E. GRIFFITH

JAMES E. MOORE
CRAIG THOMAS MERRITT
JAMES F. POWERS
PHILIP H. GOODPASTURE
JAMES C. DIMITRI
PAUL E. BRODERICK
ERIC E. BALLOU
E. FORD STEPHENS
THEODORE FLOYD ADAMS, III
CAROL C. RAPER
ERIN A. SHEEHEY
PATRICIA M. POWIS
LISA A. DAVIS
ROBERT S. BALLOU
ARBELYN E. WOLFE
JAMES L. BANKS, JR.
JOHN R. ALFORD, JR.
LAURA B. HERNANDEZ
ANDREW J. DOLSON
CAROL E. DALLE MURA
CAROL K. BARNHILL

WRITER'S DIRECT DIAL NUMBER:

John C. Laager, Esquire Senior Attorney Arco Products Center P. O. Box 2570 Los Angeles, California 90051-0570

Metro Container Site, Trainer, Pennsylvania -

Flippo's Oil Co.

#### Dear John:

Following up on an earlier contact with Arco, this is to inform you that Mr. Flippo recently received the enclosed PRP Committee letter concerning the cleanup at the above-referenced With respect to Flippo's Oil Co., the indication (see Attachment 2 enclosed) is that it will be charged for 1985 with 132 drums. As indicated on page 2 of the letter, "the inventory does not account for the fact that the company whose name appears on the drum did not necessarily send the drum to the site." With respect to Flippo, as I believe you are aware, the identification of its name with any drum does not take into account that Flippo was only responding to Arco's directions as a pre-condition to a return of deposit when it transported drums to the site. Under such circumstance it would seem appropriate for Arco to indemnify and hold harmless Flippo for any expenses incurred in having to deal with this matter. I would like to resolve this matter upon receipt of the PRP allocation anticipated shortly and to that end would be pleased to forward you a summary of Flippo's expenses already incurred.

I would appreciate it if you would let me know Arco's position with respect to indemnifying and holding harmless Flippo.

CHRISTIAN, BARTON, EPPS, BRENT & CHAPPELL

John C. Laager, Esquire Page 2 January 29, 1990

I hope that your holidays were enjoyable and that 1990 is off to a good start and will be both enjoyable and prosperous for you and your company.

Best wishes.

Singerely yours,

Paul G. Turner

PGT:rys Enclosure



#### Key to Metro Container Database Reports

Past reports from this data base have counted drums associated with more than one RP in the totals of all parties. While this method of double counting was useful for general negotiations, it does not facilitate the RP's effort to settle among themselves.

The new reports clarify the above situation. In cases where multiple RPs are associated with the same set of drums, one RP is designated as the primary RP and the other RP(s) are designated as secondary RP(s). Designations are based on the size of the parties' overall contributions to the site. Secondary RPs and their contributions are listed as subsets of the primary RPs. All of the major oil companies and their subsidiaries are considered as primary RPs.

The word ONLY is used to signify that the primary RPs contribution is not associated with any other RPs. The following is an example of the report format:

NAME	CONTRIBUTION	(drums)
*** XYZ Primary Oil Company		
<ul><li>ONLY</li><li>ABC Hauling Company</li><li>MNO Chemical Company</li><li>STU Filling Station</li></ul>	75 10 10 5	
	100	(Total)
*** PQR Primary Chemical Inc	•	
- ONLY - DEF Pharmaceutical	40 10	
	50	(Total)
*** DEF Independent Primary	Chemical	
- ONLY	50	
	50	(Total)

## DRAFT

Secondary RP	Tertiary RP	YEAR	TOTAL DRUMS
** PRIMARY RP: ONLY ** Subtotal **	AABCO STEEL DRUM, INC.	1987	4220
** PRIMARY RP:	AFCO	1985	4220 6155
ONLY ONLY ONLY ** Subtotal **		1985 1986 1987	5926
	ALUMAX ALUMINUM CORPORATION		13182
ONLY ONLY ** Subtotal **		1985 1987	247 2664
** PRIMARY RP: KELLY	AMERICAN DREDGING RHODES DRUMS	1985	2911
** Subtotal **	ANODES BROID	1505	17
ONLY SOHIO ROADWAY ONLY ONLY	B. P. OIL COMPANY	1985 1985 1986 1987	83 3768
** Subtotal **			24863
ONLY ONLY ONLY ** Subtotal **	CALLAHAN CHEMICAL CO.	1985 1986 1987	2638 5226 3915
			11779
ONLY ** Subtotal **	CAPITAL LUBRICANTS	1986	2708 2708
** PRIMARY RP: ONLY	CARLOS R. LEFFLER INC.	1987	23

Secondary RP	Tertiary RP	YEAR	TOTAL DRUMS
** Subtotal **			2.7
** PRIMARY RP: CARROLL'	C TOANCEPD		23
CAMPBELL OIL CO.  ** Subtotal **	3 TRANSEER	1985	496
34244			496
** PRIMARY RP: CONESTOG	A FUEL	1985	967
ONLY ONLY			537 - 610
** Subtotal **			2114
** PRIMARY RP: CROWN CO	RK & SEAL		
ONLY ** Subtotal **		1985	12
			12
** PRIMARY RP: E. I. DU ONLY	PONT	1985	3373
ONLY HERR'S MOTOR EXPRESS		1986 1986	286
ONLY D & B EXPRESS	PHOTO & ELECTRIC	1987	15710 656
PHOTO & ELECTRIC ** Subtotal **	D & B EXPRESS	1987	1307
			23265
** PRIMARY RP: E. J. KO ONLY	ENIG	1986	481
ONLY ** Subtotal **		1987	2025
			2506
** PRIMARY RP: FIRST ST	ATE STEEL DRUM CO.	1987	297
** Subtotal **			297
** PRIMARY RP: FRITCH F	UEL CO.	1005	6540
ONLY ONLY		1985 1986 1987	7006 7670
OHUL		1907	

# DRAFT

Secondary RP	Tertiary RP	YEAR	TOTAL DRUMS
** Subtotal **			21216
** PRIMARY RP: GB HOOBER & ONLY ONLY ONLY ** Subtotal **	SONS	1985 1986 1987	73 177 114
** PRIMARY RP: GREEN BUS L JTM DRUM ** Subtotal **	INES	1985	364
** PRIMARY RP: HOUFF TRANS AVTEX FIBERS INC. KAISER ALUMINUM & CHEMIC KAISER ALUMINUM & CHEMIC MARINE OIL SERVICE MOBIL ** Subtotal **		1985 1985 1985 1985 1985	468 250
** PRIMARY RP: INDUSTRIAL ONLY ONLY ONLY	SOLVENTS & CHEM. CO.	1985 1986 1987	1395 72 528 825
** Subtotal **			1425
** PRIMARY RP: JAY GRESS I ONLY CC ONLY ATLANTIC RICHFIELD CO. ATLANTIC RICHFIELD CO. ONLY ** Subtotal **	NCORPORATED  LYONDELL PETROCHEMICAL	1985 1985 1986 1986 1986 1987	3532 101 3913 40 43 187
** PRIMARY RP: KAISER ALUM FOGLIA ** Subtotal **	HINUM & CHEMICAL CORP.	1985	26 26

Page No. 02/14/90

# DRAFT

Secondary RP	Tertiary RP	YEAR	TOTAL DRUMS
** PRIMARY RP: JTM DRUM ** Subtotal **	KENTILE FLOORS	1985	26
** PRIMARY RP: ONLY ** Subtotal **	KESSLER CHEMICAL	1987	26 395 395
** PRIMARY RP: ONLY ** Subtotal **	LANEY OIL CO. INC.	1985	472 472
** PRIMARY RP: ONLY ONLY ** Subtotal **	LEHIGH GAS & OIL	1986 1987	296 268 564
** PRIMARY RP: ONLY JTM DRUM ** Subtotal **	MARCAL PAPER	19 <b>85</b> 1985	
** PRIMARY RP: ONLY ONLY ** Subtotal **	NATIONAL SOLVENT	1986 1987	1897 5668 7565
** PRIMARY RP: ONLY SUPERIOR SUPERIOR ** Subtotal **	OCCIDENTAL CHEM & PLASTICS	1985 1985 1986	282 3137 90 3509
** PRIMARY RP: ONLY ** Subtotal **	PEPPELMAN OIL CO.	1985	66
** PRIMARY RP:	REX OIL CO.	1985	463

## DRAFT

Secondary RP	Tertiary RP	YEAR	TOTAL DRUMS
AMERICAN KOYO ASHEVILLE OIL CO. BEALL OIL CO. GENERAL TIRE & RUBBER C NATIONAL CAN CORPORATIO PETROLEUM SOUTHERN LUBRICANTS SOUTHERN OIL CO. ** Subtotal **		1985 1985 1985 1985 1985 1985 1985	41 395 52 71 245 543 95 319
			2224
** PRIMARY RP: RYDER TRU JET BLAST ** Subtotal **	CK RENTAL	1987	10
•			10
** PRIMARY RP: SKF INDUS ONLY ** Subtotal **	TRY	1985	6
			6
** PRIMARY RP: SUN OIL O ONLY HERR'S MOTOR EXPRESS SANDRI INC. SUN OLIN CHEMICAL COMPA SUN REFINING & MARKETIN ONLY	.N	1985 1985 1985 1985 1985 1987	1513
** Subtotal **	•		14096
** PRIMARY RP: SUN PETRO POLIT FREIGHT CARRIES ** Subtotal **	DLEUM	1985	140 140
** PRIMARY RP: SUN REFIN SUN TECH ** Subtotal **	NING & MARKETING	1985	199
** PRIMARY RP: SUN TRANS ONLY ** Subtotal **	SPORT INC.	1985	



Secondary	RP	Tertiary RP	YEAR	TOTAL DRUMS
** PRIMARY ONLY ONLY ONLY ** Subtotal	RP: ARCO CHEMIC	CAL CO.	198 <b>5</b> 1986 1987	839 1956 492
				3287
ONLY A. C. & T. A. E. WALE A. M. P. I ACCURATE S ACE AUTO ACE AUTO ACE BOTTLE ACE SUPPLY ACME MARKE ADAMS OIL ALIROEL ALLERMAN ALMORT INC ALLERMAN ALMORT INC ARCO PETRO ARCO PETRO ATLANTIC O BAXER INDO BAXER I	CO. INC.  KER INC.  INC.  SCREWING  SUPPLY CO.  ED GAS  CTS INC.  CO.  CAN CO.  CLEUM PRODUCTS   HERR'S MOTOR EXPRESS	1985 1985 1985 1985 1985 1985 1985 1988 1988	2134 217 215 800 191 555 283 243 5190 165 165 164 519 165 167 168 169 169 169 169 169 178 189 189 189 189 189 189 189 189 189 18	

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Secondary RP	Tertiary RP	YEAR	TOTAL DRUMS
CRAMCO OIL CROWN CORK & SEAL DANIELSON OIL CO. DEAN OIL COMPANY DELMARVA OIL CO. DIETRICK MILK PROD DIVERSIFIED LUBRICANTS DOMINIC ZANNI DREW CHEMICAL E. E. KOUCH & SONS EGGERS CARYL CORRIGAN ENRIGHT OIL ESSCLEM CO F & W AUTO PARTS F. GAILEY FERMSTONE OIL CO. FITZGERALD TRANS FLIPPO'S OIL CO. GEARS BECK ENTERPRISE GEL'O'S ARCO GREENSBORO SUPPLY GREGORY OIL CO. HARTFORD OIL CO. HEATHCOTE LAWN HELEN LAMB HERR'S HOTLER INC. HUTTER INC. ILLEGIBLE INDUSTRIAL SOLVENTS & CH JAY GRESS INCORPORATED	Tertiary RP	R 98855555555555555555555555555555555555	
JAY GRESS INCORPORATED JOHNSON OIL CO. KAUFMAN MINTEER KELLAM ENERGY		1985 1985 1985 1985	444 92 3 120
KELLAM PROPANE KELLER OIL COMPANY L. R. WATERS L.R. WATERS INC.		1985 1985 1985 1985	16 <b>6</b> 76 78
L.R.WATERS LAKE CHAMPLAIN COAL CO. LIBERTY OIL CO. LIG CARBONIC CORP LOOMIS ARMORED INC.		1985 1985 1985 1985 1985	134 6 141 3 8
LOOMIS ARMORED INC.	PROCTOR EXPRESS	1985	1



Secondary RP	Tertiary RP	YEAR	TOTAL DRUMS
LUBECO INC.  M S M SERVICE CO.  M. COBLEN SONS  MANASSAS ICE & FUEL  METALLURGICAL PROC.  MITCHELL TIRE  MOLECULAR CHEMICAL  MONGAN CX  NORMAN BRIGHT INC.  NORTON PETROLEUM  OKLAHOMA OIL CO.  OTTO-HOFFMAN SONS  P.S.C.  PAMMELL CO.  PARTS ELEVATOR  PATTERSON MOTOR OIL  PAUL T. MARONE  PEDRONI FUEL CO.  PENNA BOX DIV.  PEOPLES GAS & OIL  PETROL PLUS  PHILA BETH & HERR  PHILADELPHIA BETH. HERB  POH-BUS SERVICE  POLT BUS SERVICE  PORT BUS SERVICE  RALPH BRASHER  RAYMOND NIMEY  RED'S OF JEFFERY INC.  REIMER BROTHERS  REINER OIL  REYNOLDS METAL CORP.  S. B. COLLINS  S. C. SHORTLIDGE  SADLER BROTHERS OIL  SCHULTZ LUBRICANTS  SEDLER BROS. OIL  SCHULTZ LUBRICANT  SCHULTZ LUBRICANT  SCHULTZ LUBRICANT  SCHULTZ LUBRICA	HERR'S	198555555555555555555555555555555555555	62238521120517733235143829522156351751064663200147749447110427

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Secondary RP	Tertiary RP	YEAR	TOTAL DRUMS
ONLY AMES SUPPLY ATLANTIC REFINING AND MA ATLANTIC REFINING AND MA NORMAN BRIGHT INC. SUPERIOR CARRIERS	LYONDELL PETROCHEMICAL GLASCOW	1985 1985 1988 1988 1988 1988 1988 1988	19 27 228 200 516 911 91 11 21 23 84 42 126 43 25 84 25 16 44 26 45 55 16 16 16 16 16 16 16 16 16 16
** Subtotal **  *** Total ***			15549
			18836

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# METRO CONTAINER DRUM COUNT REPORT ****CHEVRON**** FINAL DRAFT REPORT

Secondary RP	Tertiary	RP Y		TOTAL DRUMS
** PRIMARY RP: CHEVRON ONLY GULF OIL ONLY ONLY A. M. P. INC. A. SULLIVAN CORP. A. ULRICH ADAM UGG OIL CO. ADOOCAK SERVICE AGGREGATES INC ALGONQUIN CHEMICAL AMERICAN OIL SUPPLY ARLINGTON SCHOOL BOARD ARMCO INC ARTHUR ULRICH AVIS RENT-A-CAR B. L. JEHU BAKER & RUSSELL INC. BALTIMORE GAS & ELECTRIC BERKEBILE OIL CO. BETHLEHEM MINES CORP. BETTY FORNED METALS BORO OF CHAMBERSBURG BRINKERS FUEL BROWING OIL CO. BROWNING OIL BRUCE MILLER CO. C H MASLAND C. C. GOODLING & SON C. E. WILLIAMS & SONS C. L. MACK INC. CAR TECH CARLOS R. LEFFLER INC. CENTRAL LUBE CHABOT'S PETROL CONSTRUCTION SYSTEMS DAVIDSON STORE CO DEFAZIO EXPRESS DAVIDSON STORE CO DEFAZIO EXPRESS DESOUSA OIL SERVICE DON P. MEISTER DUKE HEATING OIL			.986	499 86287 19819 13342 1730 1131 160 1746 131 1735 1141 1735 1141 1141 1141 1141 1141 1141 1141 11
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# METRO CONTAINER DRUM COUNT REPORT ****CHEVRON**** FINAL DRAFT REPORT

Secondary RP	Tertiary RP	YEAR	TOTAL DRUMS
EASTERN INDUSTRIES EASTERN INDUSTRIES EGON OIL & SUPPLY ELCO & HAUSMAN CONSTRUCT ELECTRICAL MAINT ERIE PETROL FALCON OIL CO. FARRED CO-OP FRANK M. POWELL	GULF OIL	1987	336 14 169 27 1 228 136 165 382
G L S INC	GULF OIL	1987 1987 1987 1987 1987 1987 1987 1987	72 3 2 3 117 506 90 176 29 45 18 130 9127 19 84 8
	ALGER OIL	1987 1987 1987 1987 1987 1987 1987 1987	85 1 5 823 148 138 180 3 111 53 405 598 2 192 144 160

# METRO CONTAINER DRUM COUNT REPORT ****CHEVRON**** FINAL DRAFT REPORT

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Secondary RP	Tertiary	RP	YEAR	TOTAL DRUMS
NEVILLE ISLAND TERMINAL			1987	68
NEWMAN CO.			1987	9
O'SULLIVAN CORPORATION			1987	54
P P & LIGHT			1987	81
P.A. POWER & LIGHT CO.			1987	20
PA. METALLURGICAL INC.			1987	24
PA. POWER & LIGHT CO.			1987	677
PAUL BRADIGAN & SONS			1987	476
PAUL MORETTO			1987	2
PETROLEUM			1987	3
PHILA. GAS WORKS			1987	146
PHILA. TBA CENTER			1987	18
PIKE HEATING OIL			1987	73
PITT APPLIED RESEARCH			1987	12
POMONS OIL CO.			1987	1
PRINT BAY FUEL			1987	117
Q PETROL			1987	80
QUICK SERVICE TAXI			1987	16
R & L MACHIRE			1987	2
R & W OIL			1987	204
R. J. STEPHENSON			1987	142
READING COMM			1987	20
RINGER PETROL			1987	98
ROBERT ROYER			1987	3
ROOT OIL CO.			1987	108
S. BUNTING & SONS		•	1987	26
S. W. RAWLS INC.			1987	2349
SCLEK OPTICAL			1987	4
SENICK INC			1987	ĝ
SHELLHORN OIL			1987	122
SHELLHORN, INC.			1987	132
SHERWOOD B.			1987	6
SOUTHWORK COOPERAGE			1987	62
STANLEY OIL CO.			1987	144
STATE LIVE OIL			1987	5
STREFLING OIL			1987	114
SUBURBON OIL CO.			1987	124
SULLIVAN CORP.			1987	3
TAYLOR			1987	276
TAYLOR OIL CO.			1987	232
TEVIS OIL CO.			1987	232
TREULS OIL			1987	50
TRI STATE PETROL			1987	459
V.C. GOODLING & SON			1987	29
VAN SANT EQUIP.			1987	92
VAROUGH OIL			1987	76

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## METRO CONTAINER DRUM COUNT REPORT ****CHEVRON**** FINAL DRAFT REPORT

Secondary RP	Tertiary RP	YEAR	TOTAL DRUMS
W. SCHUAB WARNER OIL CO. WARREN OIL CO. WASHINGTON T.B.A. CENTER WASHINGTON T.B.A. CENTER WILEY CORK CO WILSON FORGING WOODLAWN OIL ** Subtotal **	SALES	1987 1987 1987 1987 1987 1987 1987	3 124 56 6 4 1 4
*** Total ***			64528 . 64528



Secondary RP	Tertiary RP	YEAR	TOTAL DRUMS
** PRIMARY RP: MOBIL OIL CO			
ONLY A. P. A. LEASING	TTW DOIL	1985 1985	109134
A. P. A. TRANSPORT	JTM DRUM  SUPERIOR  JTM DRUM	1985	13
A. P. A. TRANSPORT	JTM DRUM	1985	19
AIR DELIVERY SERVICE		1985	17
AIRCO INDUSTRIAL GASES ALLEN HYDRO INC.		1985	18
ALLENTOWN CEMENT CO.		1985	8 15
ALUMAX ALUMINUM CORPORAT		1985	163 -
ALUMAX ALUMINUM CORPORAT	SUPERIOR	1985	52
AMERICAN BILTRITE INC	TOW DOWN	1985	58
AMERICAN CAN CO. AMPIN STEEL CAST	JIM DRUM	1985	4 /
APPLETON PAPERS		1985	13
ASHEVILLE OIL CO.	SUPERIOR  JTM DRUM	1985	210
ATERBERT IMBT INC		1985	18
ATLAS TRUCK RENTAL AUTO SERVICE INC		1985	15
AUTOLINE LUBRICANTS		1985	128
AUTOLINE LUBRICANTS	AMF INC.	1985 1985 1985	153
AUTOMOTIVE SERVICE INC.		1985	647
AVTEX FIBERS INC.	5000 071 00	1985	
B & D TRANSFER INC. B.M.Y.	ROOT OIL CO.		204 119
BALL UNIMARK PLASTICS		1985	
BAUSERMAN OIL CO		1985	1
BEALL OIL CO.	REX OIL CO.	1985	25
BEAR GAP STONE INC.	CURENTOR	1985	
BECHTEL INC. BENDIX PLASTICS	SUPERIOR	19 <b>85</b> 19 <b>85</b>	72 16
BETH ENERGY MINES	o in bhon	1985	
BETHLEHEM MINES CORP.	SUPERIOR JTM DRUM	1985	50
		1700	34
BLACK & DECKER BOB RHONE	r	1985	1
BORG-WARNER CORP.		1985 1985	5 8
BRIDON AMERICAN CORP.		1985	5
BUDD COMPANY	SUPERIOR	1985	173
BUILDERS EXPRESS		1985	6
CALL CHROMYCAL CAPITAL SERVICES		1985 1985	12 18
CARL BICKER INC.		1985	24
CARLOS R. LEFFLER INC.		1985	266
CARMINZ-ZAPPARDINO		1985	1
CARRIER AIR		1985	2

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Secondary RP	Tertiary RP	YEAR	TOTAL
CARSON LINE CO CATAWISSA VALVE CERTAIN TEED CORP. CHAMPION VALLEY		1985 1985 1985 1985	
CHEMICAL LEAMAN TANK LIN COCA COLA COLGATE PALMOLIVE CO.	JTM DRUM	1985 1985 1985	80 5 53
COMMUNITY AUTO CONTAINER CORP. OF AMERI COORDINATED TRANSPORT IN		1985 1985 1985	3 14 32 -
COPLAY CEMENT CORBEY CEMENT CROWN CORK & SEAL		1985 1985 1985	20 <b>2</b> 88
CROWN CORK & SEAL D & R SUPPLY D.M.E. CO. DANA CORPORATION	JIM DRUM	1985 1985 1985 1985	7
DAVEY COMPANY DAVIS PRECISION DEAN OIL COMPANY		1985 1985 1985	118 3
DELMARVA POWER & LIGHT DENA CORPORATION DRUG PLASTICS		1985 1985 1985	118 8
DUELL FUEL COMPANY DUNMORE OIL CO. E.C. BARNES, INC EAST COAST RAILROAD		1985 1985 1985 1985	30 32
EASTERN FREEZE CO. EDISON PRODUCTS EICKELBERGER WELL DRILL,	JTM DRUM	1985 1985 1985	10 80 5
ERB BROTHERS ESSEX CHEMICALS FEGLEY OIL CO. FISHER BODY - DIVISION O	JTM DRUM	1985 1985 1985 1985	20 176
FLINCHBOUGH PRODUCTS FRANCIS SMITH & SONS FULLER COMPANY		1985 1985 1985	45 4 23
G. W. BOLLMAN CO. G. W. DAVIS OIL CO. G.T.E. PRODUCTS CORP.		1985 1985 1985	7 66 2
GEMSTAR STONES CO. GENERAL CRUSHED STONE GEORGE H. BLOUGH		1985 1985 1985	16 44 14 20
GLIDDEN SCM. GRAVE MFG. CO. INC. GREAT LAKES DREDGE	JTM DRUM	1985 1985 1985	79 30

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Secondary RP	Tertiary RP	YEAR	TOTAL DRUMS
GREAT SOUTHERN GREEN BUS LINES GRUMMAN AEROSPACE	JTM DRUM	1985 1985 1985	21 57 135
GRUMMAN AEROSPACE H. J. TANNER INC. HARDESTY & MONROE HERBERT INBT INC.	JTM DRUM	1985 1985 1985	92 21 5 49
HERCULES CORPORATION HERCULES CORPORATION HERSHEY CHOCOLATE	JTM DRUM  JTM DRUM  JTM DRUM	1985 1985 1985	32 200 2-
HERTZ PENSKI HIGHHOUSE OIL CO. HOEGANES HOFFMAN LAROCHE		1985 1985 1985 1985	3 72 64 27
HOFFMAN LAROCHE HONEYWELL TRANSFER HOOKER & HOLLOWELL OIL C HOPPERS CO.	JTM DRUM	1985 1985 1985 1985	24 5 750 5
HOUCK MFG. CO. HOUFF TRANSFER CO. HOUFF TRANSFER CO.	BLUE GRASS OILS INC.	1985 1985 1985	6 2393 256
HOUFF TRANSFER CO. HOUFF TRANSFER CO.	K. SALES INC. KAISER ALUMINUM & CHEMIC MARINE OIL SERVICE MOBIL OIL COMPANY	1985 1985 1985 1985	1390 590 2768 184
HOUFF TRANSFER CO. HOUFF TRANSFER CO. IDEAL CORP	NEW RIVER OIL CO. SPENCER BROTHERS INC. JTM DRUM	1985 1985 1985	996 706 74
ILLEGIBLE INDEPENDENT CORRUGATED INGERSOLL RAND EQUIPMENT INGERSOLL RAND EQUIPMENT	SUPERIOR	1985 1985 1985 1985	5
INLAND CONTAINER CORP. INLAND TERMINAL INTELLIGENCER INTERNATIONAL TERMINAL	JTM DRUM	1985 1985 1985 1985	14 61 1 81
J. B. HUNT TRANSPORT CO. J. E. BAKER CO. JAMES RIVER & DIXIE NORT	OTA DROM	1985 1985 1985	288 38 9
JAMES RIVER/REGAL DIV. JOE SEAGRAM KAISER ALUMINUM & CHEMIC KANCCH-BEIYLES	SUPERIOR HOUFF TRANSFER CO.	1985 1985 1985 1985	156 5 2074 · 2
KAWECK-BERYLCI KENTILE FLOORS KENTILE FLOORS	JTM DRUM	1985 1985 1985	3 64 582



Secondary RP	Tertiary RP	YEAR	TOTAL DRUMS
KEYSTONE PAVING KILGER & SONS INC KIMBERLY CLARK KOHN BROTHERS KOPPERS CO. INC. KUHN BROTHERS INC. L F TAYLOR INC LANDIS TOOL CO. LANEY OIL CO. INC. LANSDALE TRANS LEATZ MILLING CO. LEBANON MACHINE LESTER M. PRANGE CO. LIBERTY OIL CO. LLOYD J. NOLAN FUEL M & MARS M. CLAUSERINGS		1985 1985 1985 1985 1985 1985 1985 1985	73 264 46 90 110 39 2008 7 11 256 55 15
M.S. REICHENBACK MACK TRUCK	NESTFALL SUPERIOR	1985 1985 1985 1985 1985	60 50 26
MCT SERVICES MD ASSOCIATES SILVER EAG MERCH AND CO. INC. METROPOLITAN CORACM MIDWAY OIL & GAS MIDWAY OIL & GAS MONMOUTH PETROLEUM CO.	JTM DRUM	1985 1985 1985 1985 1985 1985	182 220 23 16 175 832 409
MOORE BROS. OIL CO. MUNCY MACHINE & TOOL N. S. ZINC CO. NATIONAL CAN CORPORATION NATIONAL ROLLING MILLS I NATIONAL ROLLING MILLS I NEAPCO PRODUCTS INC. NEW JERSEY ALUMINUM NEW YORK BUS COMPANY NORTH PENN TRANS NORTH TRANSFER	AMF INC. JTM DRUM SUPERIOR WESTFALL ACE DRUM C EQT JTM DRUM JTM DRUM	1985 1985 1985 1985 1985 1985 1985 1985	5



Secondary RP	Tertiary RP	YEAR	TOTAL DRUMS
OIL HEAT & BURNER OWENS CORNING FIBERGLASS OWENS CORNING FIBERGLASS OWENS ILLINOIS INC. P. H. GLATFELTER CO. P.M.E. CO.		1985 1985 1985 1985 1985 1985	17 45 69 13 644
PALMYRA INDUSTRIES PANASOTE PARAYA INDUSTRIES PAUL H. KURTZ PAUL ORKIN T/A PAULS CHE	JTM DRUM	1985 1985 1985 1985 1985	11 101 3 18 23
PAULSEN WIRE ROPE CO. PEDRONI FUEL CO. PETES T/A DJW PETROLEUM PHILA. ELECTRIC CO. PHILADELPHIA GEAR CORP.	SUPERIOR	1985 1985 1985 1985 1985 1985	6 51 1 967 130 362
PHOENIX INC. POLORON PRODUCTS POLOSEN PRODUCT POTAMOR EDISON CO. POTTSVILLE BLEACH & DYIN PRECISION COMPONENTS COR		1985 1985 1985 1985 1985	89 13 3 7 1 6
PRECISION ROLL GRINDERS PRESS ENTERPRISE PROLERIZED SCHIABO PSE4G PSE4G	JTM DRUM	1985 1985 1985 1985 1985	7 2 126 86 86
		1985 1985 1985 1985 1985	267 5 124 10 2
R.E. ENERRY REESE CANDY CO. REEVES HOFFMAN REX OIL CO. REX OIL CO.	ACME INC.	1985 1985 1985 1985 1985	3 20 6 3566 719
REX OIL CO. REX OIL CO. REX OIL CO. REX OIL CO.	AMERICAN KOYO CAROLINA FREIGHT CARRIER NATIONAL CAN CORPORATION PEOPLES GAS & OIL PETROLEUM	19 <b>85</b> 19 <b>85</b> 19 <b>85</b>	235 469 235 59 1574 195
REX OIL CO. REX OIL CO.	SOUTHERN LUBRICANTS SOUTHERN OIL CO. SUMTER PETROLEUM	198 <b>5</b> 198 <b>5</b> 198 <b>5</b>	150 217

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Secondary RP	Tertiary RP	YEAR	TOTAL DRUMS
RHODES DRUMS ROADWAY EXPRESS CORP. S. LEASE WARNER	AMERICAN DREDGING AMERICAN DREDGING	1985 1985 1985	16 10 65
SAGE OVERHAUL SAVANNAH OIL & CHEMICAL SAVANNAH OIL & CHEMICAL SCHIOVOME CONSTRUCTION SCHUBERT INC.	MDA ASSOC. JTM DRUM	1985 1985 1985 1985 1985	456 165 82
SCHUCHART INC. SERVICE OIL CO. INC. SILVER EAGLE SKF INDUSTRY SMITH BROTHERS		1985 1985 1985 1985 1985	5
SNEDECKER OIL CO. ST. JOHNSBURY TRUCKING ST. JOHNSBURY TRUCKING ST. JOHNSON		1985 1985 1985 1985	77 7 174 8
STANDARD BOAT COMPANY STANDARD STEEL STAR OIL STROH BREWERY CO.	SUPERIOR	1985 1985 1985	100 324
STROH BREWERY CO. SUPERIOR T.R.M. INC.	AMF INC. STROH BREWERY CO.	1985	9 111 17
THEODORE PANACCION	JTM DRUM	1985 1985 1985 1985	10 14 83 9
THOMAS D. FREDERICK THOMPSON CORP. TOLINO-FUEL SERVICE TONY CORP.		1985 1985 1985 1985	9 1 2 15 7
TONY LEININGER TOPPER PETROLEUM TOWER SALES INC. TRANSAMERICA DELAVAL	·	1985 1985 1985 1985	1 5 2 40
	WESTFALL ACE DRUM CO.	1985 1985 1985 1985	119 13 6
TWA JFK AIRPORT U.P.S. U.S. GYPSUM CO.	JTM DRUM	1985 1985 1985	56 4 6
U.S. METAL & REFINING U.S. STEEL CORP.	JTM DRUM	1985 1985	170 69

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Secondary RP	Tertiary RP	YEAR	TOTAL DRUMS
WEIER NC WEISS MARKETS INC. WESTINGHOUSE ELECTRIC CO WHITCHALL CEMENT WHITE OIL CO. WHITEHALL CEMENT	JTM DRUM  J. B. HUNT TRANSPORT CO.	1985 1985 1985 1985 1985 1985 1985 1988 1988	1 57 181 8 50 28 3 25 12 38 5 3649
WILGER & SON INC WMATA WOODSTREAM CORP WORLD TRANSMISSION WYETH LAB. YORK DRILLING CO. INC. YORK OIL SERVICE ONLY BLUE GRASS OILS INC. ILLEGIBLE KAISER ALUMINUM & CHEMIC KAISER ALUMINUM & CHEMIC MARINE LAUNCH RAY PEPPELMAN INC.	HOUFF TRANSFER CO.	1985 1985 1985 1985 1985 1986 1986 1986 1986	2 50 15 3 19 3 13 213 198 2 233 125
ONLY ? GORETALE DWAYNE ? SALLIDY OIL CO, INC ? VOITH NYDKO INC ACME INC. AIR DELIVERY SERVICE AUTOMOTIVE SERVICE INC. BLUE GRASS OILS INC. C A SPALDING CO CARL KING INC. CARLOS R. LEFFLER INC. CARLOS R. LEFFLER INC. CHEMICAL LEAMAN TANK LIN CONSUMER OIL CORP. CONTINENTAL CAN CO. D & R SUPPLY DEAN OIL COMPANY DELMARVA POWER & LIGHT	JOHN TRUCKING	1987 1987 1987 1987 1987 1987 1987 1987	41787 2 13 9 244 9 162 181 2 43 2722 111 19 43 4



	•	YEAR	
DUELL FUEL COMPANY FAIRCHILD WESTON FEGLEY OIL CO. FILGER CO. FISHER GUIDE FLINCHBOUGH PRODUCTS G. W. BOLLMAN CO. G. W. DAVIS OIL CO. GENERAL ELECTRIC CO. GEO SCHLICHE SON GERALD SCHOCLLEPA GRAVE SILK CO GTE PRODUCTS GUARD ALL CHEMICAL CO H. J. TANNER INC.	,	1987 1987 1987 1987 1987 1987 1987 1987	<b>.</b>
HARRISSON EAST HERTZ CORP HOOKER & HOLLOWELL OIL C	B. P. OIL COMPANY	1987 1987 1987 1987 1987 1987 1987	7 6 1011 73 60
J. B. HUNT TRANSPORT CO.	MOORE BROS. OIL CO. NELSON OIL CO. SAVANNAH OIL & CHEMICAL SOUTHERN LUBRICANTS SOUTHERN OIL CO. W F HOBBS	1987 1987 1987 1987 1987 1987 1987 1987	384 450 155 288 162 248 64 290 157
KAISER ALUMINUM & CHEMIC KAISER ALUMINUM & CHEMIC LANEY OIL CO. INC. LEASE WARNER. LEASEWAY PURCHASING CORP LEE OIL CO LIBERTY OIL CO.	W. K. HOBBS INC. HOUFF TRANSFER CO.  J. B. HUNT TRANSPORT CO.	1987 1987 1987 1987 1987 1987 1987	701 4104 3063 10 12 109 102
MABRAK LINE MAGIC MARKAS MARINE LAUNCH MARK CAIN TRUCKING MAUGER & CO MAUGER & CO INC	CAMPBELL OIL CO.	1987 1987 1987 1987 1987 1987	32 3 629 224 152 165



Secondary RP	Tertiary RP	YEAR	TOTAL DRUMS
MAUGER & CO INC. MAUGER & CO. MAUGER & COMPANY INC MAUGER CO MAUGER SIMPSON MAUGILL CO INC. MOBIL OIL COMPANY MONMOUTH PETROLEUM CO. MOORE BROS. OIL CO. NATIONAL CAN CORPORATION OCCIDENTAL CHEMICAL OWENS ILLINOIS INC.	J. B. HUNT TRANSPORT CO.	1987 1987 1987 1987 1987 1987 1987 1987	
P M HARPER P. H. GLATFELTER CO. PACKAGING CORP OF AMERIC PENNWALT CORP. PEPPELMAN OIL CO. PETROLEUM PETROLEUM PETROLEUM	BIIGFR & SONS INC	1987 1987 1987 1987 1987 1987 1987	472 4 3 8 958 3
PETROLEUM PRODUCTS CORP. PHILA. ELECTRIC CO. PHOENIX INC. PRECISION COMPONENTS COR QANES ALLOY. CASTING CO RAY PEPPELMAN INC. REIT LUBRICANTS CO. REIT SERVICE CO.	•	1987 1987 1987 1987 1987 1987 1987	25 99 756 15 1
REX OIL CO. REX OIL CO. REX OIL CO. REX OIL CO.	ACME INC. BEALL OIL CO. CAROLINA FREIGHT CARRIER PEOPLES OIL & GAS PETROLEUM WAND PETROLEUM WORLD	1987 1987 1987	4871 647 84 481 234 160 426
ROOT OIL CO.	J. B. HUNT TRANSPORT CO.  CONSUMER OIL CORP.	1987	

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Secondary RP	Tertiary RP	YEAR	TOTAL DRUMS
SOUTHERN OIL CO. SOUTHERN OIL CO. ST. JOHNSBURY TRUCKING STOCKMAN OIL	J. B. HUNT TRANSPORT CO. J. B. HUNT TRANSPORT CO.	1987 1987 1987 1987	51 523 264 265 568 8 282
	J. B. HUNT TRANSPORT CO. STROH BREWERY CO.	1987 1987 1987 1987 1987 1987 1987 1987	288 54 12 16 14 4 52 2 138
VYMCAL W. H. JOHNS	PLANT #2	1987 1987 19 <b>87</b>	9 7 270
W. H. JOHNS W. H. JOHNS W. K. HOBBS INC. WESTINGHOUSE ELECTRIC CO WHITE OIL CO.	PETROLEUM SERVICE CO. WITTER OIL & GAS J. B. HUNT TRANSPORT CO.	1987 1987 1987 1987 1987	79 216 182 8 3676
WHITE OIL CO. YORK DRILLING CO. INC. YOST M KUNTZ INC ** Subtotal **	OVERNITE TRANSPORTATION	1987 1987 1987	264 2 4
*** Total ***			243893
			243893

COMPANY NAME	DRUMS	SENT	TO	METRO
47 4m 40 40 40 40 40 40 40 40 40 40 40				
MOBIL OIL COMPANY		230	, 49:	3
CHEVRON		64	,71:	3
B. P. OIL COMPANY		29	, 428	3
E. I. DUPONT			, 26	
FRITCH FUEL CO.			,21	
ARCO PETROLEUM PRODUCTS CO.			, 89	
REX OIL CO.		15	, 27	L
SUN OIL CO.			, 09	
AFCO		13		
HOUFF TRANSFER CO.		12		
CALLAHAN CHEMICAL CO.			,77	
JAY GRESS INCORPORATED		8		
GULF OIL		8		
NATIONAL SOLVENT		7		
WHITE OIL CO.		6	•	
KAISER ALUMINUM & CHEMICAL CORP.		5		
LANEY OIL CO. INC.		5		
J. B. HUNT TRANSPORT CO. INC.		5		
SUPERIOR			,62	
AABCO STEEL DRUM, INC.		4		
MARINE LAUNCH			,58	
OCCIDENTAL CHEM & PLASTICS			,52	
PETROLEUM			,42	
CARLOS R. LEFFLER INC.			, 29	
ARCO CHEMICAL CO.			, 28	
JTM DRUM			, 22	
ALUMAX ALUMINUM CORPORATION			,12	
CAPITAL LUBRICANTS			,70	
E. J. KOENIG			,50	
			,34	
S. W. RAWLS INC.			,11	
CONESTOGA FUEL	c		,01	
FISHER BODY - DIVISION OF GENERAL MOTOR	3		, 99	
HERR'S MOTOR EXPRESS				
D & B EXPRESS			,96	
PHOTO & ELECTRIC			,96	
SCHUCHART INC.			, 86	
HOOKER & HOLLOWELL OIL CO.			, 83	
MOORE BROS. OIL CO.			.,79	
INDUSTRIAL SOLVENTS & CHEM. CO.	ř		.,73	
ACME INC.			.,55	
SAVANNAH OIL & CHEMICAL			.,44	
K. SALES INC.			.,39	
SOUTHERN LUBRICANTS			.,37	
ILLEGIBLE		]	.,35	59

COMPANY NAME	DRUMS SENT TO METRO
** 00. 40 40 40 40 40 40 40 40 40 40 40	
SOUTHERN OIL CO.	1,356
AVTEX FIBERS INC.	
REIT LUBRICANTS CO.	1,289
	1,236
ASHEVILLE OIL CO.	1,141
P. H. GLATFELTER CO.	1,116
MIDWAY OIL & GAS	1,007
PHOENIX INC.	981
CAROLINA FREIGHT CARRIERS	929
NATIONAL CAN CORPORATION	910
SUN REFINING & MARKETING	897
REIT SERVICE CO.	857
HOME OIL	832
AUTOMOTIVE SERVICE INC.	809
NEW RIVER OIL CO.	771
MAUGER & CO.	741
CAMPBELL OIL CO.	720
PA. POWER & LIGHT CO.	708
SPENCER BROTHERS INC.	706
SLF PARTNERSHIP T/A CONSUMER OIL	699
WAY OIL CO.	656
BLUE GRASS OILS INC.	635
CARL KING INC.	628
MARTIN OIL COMPANY	598
W. H. JOHNS	565
LEHIGH GAS & OIL	564r
HERR'S	563
W. K. HOBBS INC.	551
MONMOUTH PETROLEUM CO.	536
KIMBERLY CLARK	531
FRANK M. POWELL	526
TRI GAS & OIL	516
BARKSDALE OIL	510
GOODRICH PETROL	506
CARROLL'S TRANSFER	496
CHATHAM OIL CO.	489
PAUL BRADIGAN & SONS	476
SADLER BROTHERS OIL	466
SILVER EAGLE	464
KENTILE FLOORS	461
TRI STATE PETROL	459
	456
MDA ASSOC.	454
DANA CORPORATION	445
CENTRAL LUBE	
PETROLEUM WORLD	426

COMPANY NAME	DRUMS SENT TO METRO
ROOT OIL CO.	413
LOCKER OIL CO.	405
KESSLER CHEMICAL	395
MANASSAS ICE & FUEL	385
FISHER GUIDE	373
GB HOOBER & SONS	364
PHILADELPHIA GEAR CORP.	362
PEDRONI FUEL CO.	
	346
EASTERN INDUSTRIES	340
STAR OIL	324
SCHULTZ LUBRICANTS	323
VALLEY PETROLEUM INC.	319
PEOPLES GAS & OIL	301
FIRST STATE STEEL DRUM CO.	297
DON P. MEISTER	291
STOCKMAN OIL	288
STROH BREWERY CO.	282
STACKMAN OIL	282
AUTOLINE LUBRICANTS	281
AMERICAN KOYO	276
TAYLOR	276
ATLANTIC REFINING AND MARKETING	269
DANIELSON OIL CO.	268
PTL INTERNATIONAL	267
OVERNITE TRANSPORTATION COMPANY	264
C. L. MACK INC.	261
WILLIAM L. GIFT	258
MARIN OIL SERVICE	252
HOUGHTON	250
LIBERTY OIL CO.	248
ALTMAN DISTRIBUTION CO.	246
DELMARVA POWER & LIGHT	245
FEGLEY OIL CO.	244
PEOPLES OIL & GAS	234
TAYLOR OIL CO.	232
MATTHEWS BROS.	232
HERCULES CORPORATION	232
TEVIS OIL CO.	232
EASTERN STEEL DRUM DIV.	229
PHILA. ELECTRIC CO.	229
TILLEY CHEMICAL CO.	228
	228
ERIE PETROL	227
GRUMMAN AEROSPACE	
MARK CAIN TRUCKING	224

COMPANY NAME	DRUMS	SENT	TO	METRO
DEAN OIL COMPANY			22	4
WARREN OIL CO.			22:	2
MD ASSOCIATES SILVER EAGLE			22	0
ACE AUTO SUPPLY CO.			22	0
A. C. & T. CO. INC.			21	7
SUMTER PETROLEUM			21	7
WITTER OIL & GAS			21	6
LYONDELL PETROCHEMICAL			20	8
R & W OIL			20	4
B & D TRANSFER INC.			20	4
ALGONQUIN CHEMICAL CO.			20	2
CORBEY CEMENT			20	2
SEDLER BROS. OIL			20	0
TIOGA PETROLEUM			20	0
SUN TECH			19	9
MC MATER OIL			19	2
BETHLEHEM MINES CORP.			19	
G. W. DAVIS OIL CO.			18	
SANDRI INC.			18	
AMF INC.			18	
STALINER OIL			18	2
MCT SERVICES			18	
JACK A. ALLEN			18	
GUTTMAN OIL CO			17	
AMERICAN OIL SUPPLY			17	
GUARD ALL CHEMICAL CO			17	4
BUDD COMPANY			17	
DUKE HEATING OIL			17	
DELMARVA OIL CO.			17	
BELT, GAS & ELECTRIC			17	
PSE&G			17	
OCCIDENTAL CHEMICAL			17	
U.S. METAL & REFINING			17	
CONSUMER OIL CORP.			16	
EGON OIL & SUPPLY			16	
BILTHORE OIL CO			16	
WESTFALL ACE DRUM CO.			16	
A & B			16	
KELLAM PROPANE			16	
FARRED CO-OP			16	
JOHNS MOTOR FREIGHT			16	
SCHIOVOME CONSTRUCTION			16	
CROWN CORK & SEAL			16	
CHABOT'S PETROL			16	
CUMPOL 2 LELKOR				. •

COMPANY NAME	DRUMS SENT TO METRO
· · · · · · · · · · · · · · · · · · ·	
NELSON OIL CO.	162
BEALL OIL CO.	161
PETROLEUM WAND	160
B. L. JEHU	160
MCMACKIN	160
STANDARD BOAT COMPANY	160
TRANSAMERICA DELAVAL	159
ALLERMAN	158
W F HOBBS	157
JAMES RIVER/REGAL DIV.	156
CHARLES COAL & OIL	155
BRINKERS FUEL	152
J. O. COOK	148
BERKEBILE OIL CO.	146
PHILA. GAS WORKS	146
MCINTOSH ENERGY	144
STANLEY OIL CO.	144
RAY PEPPELMAN INC.	142
R. J. STEPHENSON	142
POLIT FREIGHT CARRIES	140
JACK A. AKEN	138
ST. JOHNSBURY TRUCKING	137
FALCON OIL CO.	136
ADAM UGG OIL CO.	135
L.R.WATERS	134
DIVERSIFIED LUBRICANTS	134
SHELLHORN, INC.	132
FLIPPO'S OIL CO.	132
HAHN OIL, INC.	130
SNEDECKER OIL CO.	128
HARRED OIL CO.	127
WAINWRIGHT OIL CO.	126
PROLERIZED SCHIABO	126
BETH ENERGY MINES	126
QUARKS PETROLEUM CO	124
WARNER OIL CO.	124
SUBURBON OIL CO.	124
CERTAIN TEED CORP.	122
SHELLHORN OIL	, 122
U.S. STEEL CORP.	121
KELLAM ENERGY	120
B.M.Y.	119
DENA CORPORATION	118
PRINT BAY FUEL	117

COMPANY, NAME	DRUMS	SENT	TO	METRO
*** 400 400 400 400 and 400 400 400 400 400 400 400 400 400 40				
GLS INC			111	7
HARTFORD OIL CO.			110	-
ARMCO INC			119	
OWENS CORNING FIBERGLASS			114	
STREFLING OIL			11	
BRUCE MILLER CO.			11:	3
DUELL FUEL COMPANY			11:	
L. F. LETTS & SONS			11	
CAR TECH			11	1
JOHN TRUCKING			11	1
KUHN BROTHERS INC.			11	0
MACK TRUCK			11	0
LEE OIL CO			10	9
ATLANTIC OIL & HEATING			10	2
CC			10	1
PANASOTE			10	1
STANDARD STEEL			10	0
CHEMICAL LEAMAN TANK LINES			9	9
RINGER PETROL			9	8
INDUSTRIAL STEEL			9	7
PATTERSON MOTOR OIL			9	6
S. B. COLLINS			9	6
CLEMENTS SUPPLY			9	6
DAVEY COMPANY			9	5
U.G.L.			9	4
FITZGERALD TRANS			9	4
GREEN BUS LINES			9	3
VAN SANT EQUIP.			9	2
JOHNSON OIL CO.			9	2
TROUTMAN OIL SERV.			9	1
KOPPERS CO. INC.			9	0
CONTAINER CORP. OF AMERICA			8	5
CLARKS PETROLEUM			8	5
HOLLIDAY & JONES			8	5
ALGER OIL			8	5
HEFFNES BRAS CO			8	4
S. C. SHORTLIDGE			8	4
THE NESTLE CO.			8	3
ATLANTIC RICHFIELD CO.				3
HOTLER INC.				3
SOHIO ROADWAY				3
N. S. ZINC CO.				3
V.G.I.				32
SCHUBERT INC.			8	32

COMPANY NAME DRUM	S SENT TO METRO
INTERNATIONAL TERMINAL	81
P P & LIGHT	81
C. C. GOODLING & SON	81
EDISON PRODUCTS	80
Q PETROL	80
MAUGER SIMPSON	80
ACE AUTO	80
PETROLEUM SERVICE CO.	79
GRAVE MFG. CO. INC.	79
L. R. WATERS	78
MARCAL PAPER	77
SERVICE OIL CO. INC.	77
VAROUGH OIL	76
KELLER OIL COMPANY	76
GREGORY OIL CO.	76
SUN TRANSPORT INC.	75
FLINCHBOUGH PRODUCTS	75
PEPPELMAN OIL CO.	74
IDEAL CORP	74
PIKE HEATING OIL	73.
KILGER & SONS INC	73
HIGHHOUSE OIL CO.	72
G L S INC	72
BECHTEL INC.	72
GENERAL TIRE & RUBBER CO.	7 <b>1</b>
AMERICAN CAN CO.	70
NEAPCO PRODUCTS INC.	69
ENRIGHT OIL	68
NEVILLE ISLAND TERMINAL	68
FILGER CO.	68
CRESENT INDUSTRIES INC.	66
S. LEASE WARNER	65
INGERSOLL RAND EQUIPMENT CORP.	65
O'SULLIVAN CORPORATION	64
ARLINGTON SCHOOL BOARD	64
HUTTER INC.	64
DREW CHEMICAL	64
NEW YORK BUS COMPANY	64
HOEGANES	64
SOUTHWORK COOPERAGE	62
W. C. SALES INC.	62
INLAND TERMINAL	61
BALTIMORE GAS & ELECTRIC	
	61

COMPANY NAME	DRUMS SENT TO METRO
	*** The first that that the first that the first that the the that the the that the the the the the the the the the th
HOORMAN INDUSTRIES INC.	60
NESTFALL	60
AMERICAN BILTRITE INC	58
AMERICAN DREDGING	58
US STEEL DIVISION (GM)	57
LESTER M. PRANGE CO.	56
TWA JFK AIRPORT	56
BOULDEN INC.	55
ALGER CO.	55
ADAMS OIL CO.	55
ARCO 4500	55
HUTLER INC.	55
L. K. MCKENZIE	53
COLGATE PALMOLIVE CO.	53
MAUGILL CO INC.	53
BROWNING OIL	51
HOFFMAN LAROCHE	51
WMATA	50
TREULS OIL	50
W.M. HOOPER & SONS, CO.	50
ACE SUPPLY	49
SOLAR COMPOUND COMPANY	49
HERBERT INBT INC.	49
AUTO SERVICE INC	48
KOHN BROTHERS	46
WESTINGHOUSE ELECTRIC CO.	46
GENERAL ELECTRIC CO.	46
ROBERT M. HARPER & SONS	46
NEW JERSEY ALUMINUM	45
H. E. GROFF	45
COPLAY CEMENT	45
SIX PAINTERS	45
SPS TECHNOLOGIES	44
GENERAL CRUSHED STONE	44
WILKINSON INDUSTRIES	43
BROWING OIL CO.	40
MASONITE CORP.	39
LANDIS TOOL CO.	39
BEINER BROS.	39
J. E. BAKER CO.	38
BILGER & SONS INC.	37
REIMER BROTHERS	36
SLF TRANSFERER	35
P.S.C.	35
4.0.0.	

COMPANY NAME	DRUMS SENT TO METRO
H. J. TANNER INC.	33
RHODES DRUMS	33
OKLAHOMA OIL CO.	33
A. P. A. TRANSPORT	32
MABRAK LINE	32
COORDINATED TRANSPORT INC.	32
E.C. BARNES, INC	32
SUPERIOR CARRIERS	31
M C	31
DAVIDSON STORE CO	30
DUNMORE OIL CO.	30
CATAWISSA VALVE	30
GREAT LAKES DREDGE	30
W. BUNTING & SON	29
ALIROEL	29
V.C. GOODLING & SON	29
COUNTRY AUTOMOTIVE	28
WACRER COMPANY	28
ELCO & HAUSMAN CONSTRUCTION	27
SMITH OIL CO.	27
SUFFOLK CHEMICAL	27
F. GAILEY	27
AIR DELIVERY SERVICE	26
S. BUNTING & SONS	26
MAIDEN CREEK FARM SUPPLY	26
FOGLIA	26
RHODES	25
PETROLEUM PRODUCTS CORP.	25
WEEKS ENGINEERING	25
UNITED OIL & BELTING	24
PA. METALLURGICAL INC.	24
CARL BICKER INC.	24
RED'S OF JEFFERY INC.	24
FULLER COMPANY	23
PAUL ORKIN T/A PAULS CHEVY	23
	23
MERCH AND CO. INC.	22
NORMAN BRIGHT INC.	22
FERMSTONE OIL CO.	21
GREAT SOUTHERN	21
REINER OIL	21
ULTRA POWER	21
PRECISION COMPONENTS CORP.	20
READING COMM	
EGGERS CARYL CORRIGAN	20

COMPANY NAME		DRUMS SENT	TO METRO
400 400 400 400 400 400 400 400 400 400			
REESE CANDY CO.			20
GLIDDEN SCM.			20
MOLECULAR CHEMICAL			20
ESSEX CHEMICALS			20
CLOVER DAIRY FARMS			20
GEO SCHLICHE SON			20
TOPPER PETROLEUM			19
KEYSTONE PAVING			19
WYETH LAB.			19
HARRY MILLER			19
C. E. WILLIAMS & SONS			19
H. S. BUNTING INC.			18
ATERBERT IMBT INC			18
PHILA. TBA CENTER			18
AIRCO INDUSTRIAL GASES			18
CAPITAL SERVICES			18
PAUL H. KURTZ			18
POLT BUS SERVICE			17
T.R.M. INC.			17
OIL HEAT & BURNER			17
KELLY			17
			17
OWENS ILLINOIS INC.			
TELEGRAPH PRESS			16
METROPOLITAN CORACM			16
GEMSTAR STONES CO.			16
QUICK SERVICE TAXI			16
BENDIX PLASTICS			16
LLOYD J. NOLAN FUEL			15
WOODSTREAM CORP			15
CARSON LINE CO			15
PETROL PLUS			15
ALLENTOWN CEMENT CO.			15
HEYCO MOTELS, INC.			15
TOLINO-FUEL SERVICE			15
ATLAS TRUCK RENTAL			15
THE DAVEN CO.			14
GEORGE H. BLOUGH			14
MAXI MFG.			14
			14
INLAND CONTAINER CORP.	TNC		14
NATIONAL ROLLING MILLS	INC.		14
AGGREGATES INC			14
NORTH TRANSFER			
SICO CO.			14
VOIT HYDRO INC.			13

COMPANY NAME	DRUMS SENT TO METRO
	DROND COME TO METRO
YORK OIL SERVICE	13
TRANSPORTATION SUPPLIES INC.	13
APPLETON PAPERS	13
A. M. P. INC.	13
POLORON PRODUCTS	13
M & M MARS	13
BAKER & RUSSELL INC.	13
F & W AUTO PARTS	13
A. P. A. LEASING	12
ZIEGLER CHEMICAL	12
CALL CHROMYCAL	12
WEIER NC	12
LEASEWAY PURCHASING CORP	12
PITT APPLIED RESEARCH	12
SUPERIOR BUILDING	12
LEATZ MILLING CO.	11
SMITH BROTHERS	11
PALMYRA INDUSTRIES	11
U.S. POST OFFICE	11
TULLEY CHEMICAL	11
SKF INDUSTRY	11
MITCHELL TIRE	11
JET BLAST	10
LEASE WARNER	10
L F TAYLOR INC	10
WOODLAWN OIL	10
GEARS BECK ENTERPRISE	10
J W WHITE TRUCK CENTER	10
STIFF OIL CO.	10
R C A	10
EASTERN FREEZE CO.	10
ROADWAY EXPRESS CORP.	10
RALPH BRASHER	10
RYDER TRUCK RENTAL	10
WASHINGTON T.B.A. CENTER	10
TAYLOR PACKING CO	10
PLANT #2	9
NEWMAN CO.	9
JAMES RIVER & DIXIE NORTHERN	9
EAST COAST RAILROAD	9
THEODORE PANACCION	9
WASNICKS-AUTO SUPPLY	9
SENICK INC	9
	9
LOOMIS ARMORED INC.	,

COMPANY NAME	DRUMS SENT TO METRO
~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	
GEL'O'S ARCO	9
DOMINIC ZANNI	9
HALSEY, INC.	9
G. W. BOLLMAN CO.	8
WILLIAM CARSEN	8
DRUG PLASTICS	8
BORG-WARNER CORP.	8
ST. JOHNSON	8
HESS OIL	8
ALLEN HYDRO INC.	8
W. G. ZIMMERMAN	8
PAUL T. MARONE	8
D & R SUPPLY	8
POTAMOR EDISON CO.	7
TONY CORP.	7
STEGMAN SERVICES	7
LANSDALE TRANS	7
TREMONT OIL	7
T. IDOLTZWORTH	7
PRECISION ROLL GRINDERS	7.
BEAR GAP STONE INC.	7
BITUMINOUS SERVICE	7
VYMCAL	7
HARRISSON EAST	7
HOUCK MFG. CO.	6
REEVES HOFFMAN	6
RAYMOND NIMEY	6
NORTON PETROLEUM	6
LUBECO INC.	6
BUILDERS EXPRESS	6
PAULSEN WIRE ROPE CO.	6
BALL UNIMARK PLASTICS	6
PHILA BETH & HERR	6
P M HARPER	6
	6
GREENSBORO SUPPLY	6.
BOWERS CO.	6
HERTZ CORP	6
NORTH PENN TRANS	€
BLOOMFIELD FARM	6
LAKE CHAMPLAIN COAL CO.	
TOWER SALES INC.	6
TRW CO.	6
U.S. GYPSUM CO.	6
SHERWOOD B.	6

PRPs IN ORDER OF DRUMS CONTRIBUTED (1985, 1986, AND 1987)

Page: 1:

COMPANY NAME DRUMS SENT TO METRO

COMPANI NAME	DROMS SENT TO METRO
YORK DRILLING CO. INC.	5
A. ULRICH	5
ACCURATE SCREWING	5
WHITCHALL CEMENT	5
WEISS MARKETS INC.	5
BOB RHONE	5
BORO OF CHAMBERSBURG	5
PUREX CORP.	5
BRIDON AMERICAN CORP.	5
COCA COLA	5 5
CRAMCO OIL	5 5
PORT BUS SERVICE	5
E. E. KOUCH & SONS	5
A. SULLIVAN CORP.	5
	5
POH-BAS SERVICE	
EICKELBERGER WELL DRILL, INC.	5
HONEYWELL TRANSFER	5
STATE LIVE OIL	5
FAIRCHILD WESTON	
TOOL SALES SERVICES	5
HARDESTY & MONROE	5
M. CLAUSERINGS	5 5 5 5 5 5 <b>5</b> 5
GLASCOW	5
HOPPERS CO.	5
I.R.I.	5
MUNCY MACHINE & TOOL	5
MONGAN CK	5 5 5
JOE SEAGRAM	5
PARTS ELEVATOR	4
SCLEK OPTICAL	4
PACKAGING CORP OF AMERICA	4
SALES	4
YOST M KUNTZ INC	4
FRANCIS SMITH & SONS	4
	4
WILSON FORGING	4
WHITEHALL CEMENT	·
BAKER INDUSTRIES	4
U.P.S.	4
CHAMPION VALLEY	4
Suburban Propane	4
C H MASLAND	4
EQT	4
DESOUSA OIL SERVICE	4
BRISTOL STEEL	4

#### METRO CONTAINER

COMPANY NAME	DRUMS SENT TO METRO
~~~~~~~~~	
CONTINENTAL CAN CO.	4
VALLEY FORGE FLAG CO.	4
SULLIVAN CORP.	3
JAUNTY FABRICS CORP.	3
J DONAHUE	3
LIG CARBONIC CORP	3
INDEPENDENT CORRUGATED	3
MAGIC MARKAS	3
KAUFMAN MINTEER	3
KAWECK-BERYLCI	3
DIETRICK MILK PROD	3
G.O.E. INC.	3
ROBERT ROYER	3
HERTZ PENSKI	3
UPPER MERION	3
DAVIS PRECISION	3
POLOSEN PRODUCT	3
WORLD TRANSMISSION	3
ADOOCAK SERVICE	3
PHILADELPHIA BETH. HERB	3
HEATHCOTE LAWN	3
ALLIED CHEMICAL	3
PARAYA INDUSTRIES	3
ALMORT INC.	3
GERALD SCHOCLLEPA	3
COMMUNITY AUTO	
ESSCLEM CO	3
GENERAL MACHINE	3
PENNWALT CORP.	3
R.E. ENERRY	
D.M.E. CO.	3 3 3 3 3 3 3 3
SAGE OVERHAUL	3
ARTHUR ULRICH	3
BETTY FORNED METALS	3
WARD MACHINERY CO.	3
W. SCHUAB	3
	2
GENERAL ELEVATOR	2
GTE PRODUCTS	2 2
OTTO-HOFFMAN SONS	2
PAUL MORETTO	2
PENNA BOX DIV.	2
THOMPSON CORP.	
G.T.E. PRODUCTS CORP.	2
HERSHEY CHOCOLATE	2

COMPANY NAME	DRUMS	SENT	TO METRO
METALLURGICAL PROC.			2
UNILED OIL			2
P.M.E. CO.			2
DEFAZIO EXPRESS			2
HICKLEYS AUTO EXP.			2
BALTIMORE AUTO			2
DAILY EXPRESS			2
M.S. REICHENBACK			2
LEBANON MACHINE			2
T. EPSTEIN AND SONS			2
YEASLEY SERVICE			2
REYNOLDS METAL CORP.			2
AMES SUPPLY			2
WILGER & SON INC			2
AMPIN STEEL CAST			2
R. S. MASTERS			2
M S M SERVICE CO.			2
CARRIER AIR			2
R & L MACHIRE			2
KANCCH-BEIYLES			2
CONSTRUCTION SYSTEMS			2
PRESS ENTERPRISE			2
C A SPALDING CO			2 2 2 2 2
A. E. WALKER INC.			2
MASLAND CO.			2
M. COBLEN SONS			* ?
PROCTOR EXPRESS			ī
QANES ALLOY. CASTING CO			i
BAUSERMAN OIL CO			î
U.S. AGRICULTURE CHEMICAL INC.			i
	-		1
PETES T/A DJW			i
KEYSTONE SCREW			1
CARMINZ-ZAPPARDINO			1
AVIS RENT-A-CAR			1
TURNMATIC INC			-
HOWARD ASAL			1
POTTSVILLE BLEACH & DYING CO			1
ELECTRICAL MAINT			1
WILEY CORK CO			1
BLACK & DECKER			1
BAY PROD			1
ERB BROTHERS			1
TONY LEININGER			1
POMONS OIL CO.			1

METRO CONTAINER
PRPS IN ORDER OF DRUMS CONTRIBUTED (1985, 1986, AND 1987)

COMPANY NAME	DRUMS SENT TO METRO
40 40 40 40 40 40 40 40 40 40	
GRAVE SILK CO	1
ACME MARKETS INC.	1
ACE BOTTLED GAS	1
PAMMELL CO.	1
THOMAS D. FREDERICK	1
STEIN -HENRY CORP.	1
B.A. BOWMAN	1
RMR CORP.	1
HELEN LAMB	1
UNION FUEL	l
INTELLIGENCER	1

LAW OFFICES OF

SAUL, EWING, REMICK & SAUL

3800 CENTRE SQUARE WEST

55 VALLEY STREAM PARKWAY SUITE JOO JREAT VALUEY CORPORATE CENTER MALVERN PA 19355

2151 25:-5050

PLAZA -OOC SUITE 554 EVESHAM AND KRESSON FOADS VCCRHEES NJ 08043 609, 424-0098

DIAL DIRECT 1215

PHILADELPHIA PA 19102

215: 972-7777

CABLE ADDRESS BIDSAL TELECOPIES 215 972-7725 TWX 83-4798

SUPPLY SHAWAJED SSS 9 0 BOX 1266 WI_M:NGTON OE :9899 302: 654-1413

901 L STREET, N W SUITE 700 WASHINGTON D C 20036 202 223-7660

TWENTY FIRST FLOOR 237 PARK AVENUE NEW YORK NY 100.7 212 551-3502

972-8663

March 8, 1989

VIA FEDERAL EXPRESS & HAND DELIVERY

TO: Metro PRP Group

RE: Metro Container Transactional Database

Dear Members:

Enclosed please find, at long last, a portion of the transactional database prepared by EPA contractor Booz-Allen.

Sincerely,

William J. Cluck

/jsd

cc: Carl B. Everett, Esquire

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PRELIMINARY DRAFT REPORT NUMBER TWO

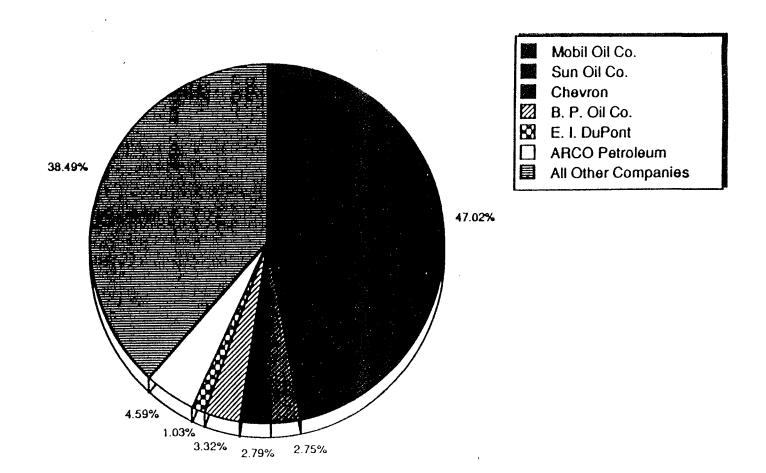
DRUMS SENT TO METRO CONTAINER BY SIX POTENTIALLY RESPONSIBLE PARTIES DURING THE YEARS 1985, 1986, AND 1987

3/4/89

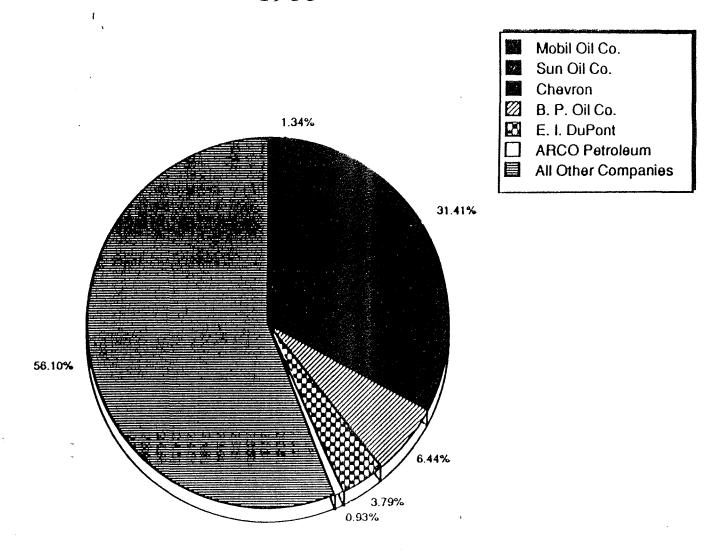
PRP	1985	Number of 1986	of Drums 1987	<u> 1985 - 1987</u>
Mobil Oil Co.	153,689	783	76,021	230,493
Sun Oil Co.	9,005	0	5,091	14,096
Chevron	9,127	18,387	37,199	64,713
B. P. Oil Co.	10,858	3,768	14,802	29,428
E. I. Dupont	3,373	2,219	17,673	23,265
ARCO	15,013	546	332	15,891
All Other Companies	125,804	32,840	101,302	259,946

Note: These figures are complete for named companies, companies but very incomplete for "All Other Companies,"

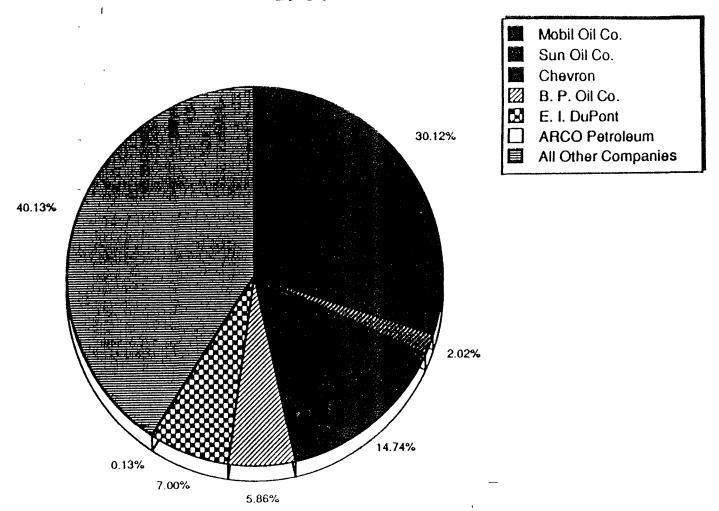
Relative Share of Drums Sent to Metro Container Site Among Sub-Committee Members' Transactions 1985



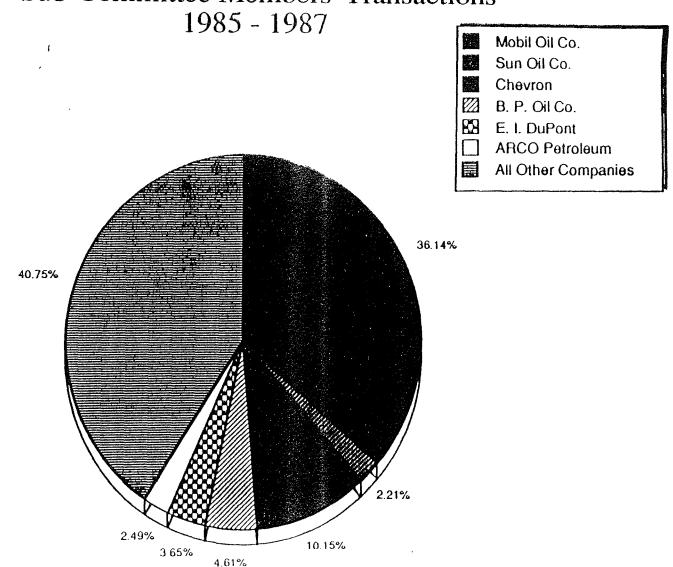
Relative Share of Drums Sent to Metro Container Site Among Sub-Committee Members' Transactions 1986



Relative Share of Drums Sent to Metro Container Site Among Sub-Committee Members' Transactions 1987



Relative Share of Drums Sent to Metro Container Site Among Sub-Committee Members' Transactions



LAW OFFICES OF

SAUL, EWING, REMICK & SAUL

3800 CENTRE SQUARE WEST

PHILADELPHIA PA 19102

(215: 972-7777

CABLE ADDRESS BIDSAL TELECOPIER (215) 972-7725 TWX 83-4798

222 DELAWARE AVENUE P O BOX 1266 WILMINGTON DE 19899 (302) 654-1413

1020 1914 STREET, N. W. SUITE BOO WASHINGTON, D. C. 20036 (202) 223-7660

> TWENTY-FIRST FLOOR 237 PARK AVENUE NEW YORK NY 10017 (212) 551-3502

MAR 0 5 1990

DIAL DIRECT (215) 972-7171

300 CHESTER FIELD PARKWAY

SUITE 200 GREAT VALLEY GORFORATE CENTER

MALVERN PA 19355 215: 251-5050

PLAZA 1000 MAIN STREET

SUITE 206 FUFRHAM AND KRESSON ROADS

VOORHEES NJ 08043

.609 424 0098

February 28, 1990

TO: Potentially Responsible Parties at Metro Container Site, Trainer, Pennsylvania

Ladies and Gentlemen:

On behalf of the Metro PRP Committee ("MPC"), I am writing this letter to (1) inform you that your company has been identified by EPA as a PRP at the Metro site, (2) provide a status report on removal activities, (3) provide copies of the contents of two databases which may pertain to your company and (4) solicit your participation in the process of allocating among all PRPs the costs incurred by the MPC in connection with site-related activities.

Earlier this year representatives of the MPC negotiated the enclosed Administrative Order on Consent as a means to conduct a removal action at the Metro Container site (Attachment 1). Various contractors were then asked to bid for the role of prime contractor, and MK-Ferguson Company was selected. MK entered into several key subcontracts. The first was with Sevenson, Inc., who performed drum characterization. The second was with OH Materials, who has handled site work, including drum crushing, tank removal and the loading of materials for off-site disposal. Hazardous wastes have gone to EnviroSafe's Oregon, Ohio facility. Non-hazardous liquids, principally rain water which has been abundant this year, were sent to Waste Conversion, Inc. of Horsham, Pennsylvania. Analytical work was performed by R.F. Weston. Total costs under the MK contract are estimated at \$5.1 million. Field activities were completed this month.

When we began negotiating the Administrative Order with EPA, we were informed that the Agency had retained Booz-Allen, a consulting firm, to develop a database of transactions using shipping papers obtained from the site operator. EPA transmitted

As noted above, an MK subcontractor inventoried drums on-site during the initial phase of the removal. Those drums which appear to link your company to the site are shown in Attachment 3. Please recognize that this inventory represents a snapshot of what was on-site when the removal action commenced. Also, the inventory does not account for the fact that the company whose name appears on the drum did not necessarily send the drum to the site. If that is the case with your company, please have the proper party get in touch with the MPC by the means discussed below.

To give you some perspective, some 14,769 of the 31,555 drums bar coded showed company names, as did 2,958 of the 3,038 small drums, which were not bar-coded.

Other information sources exist concerning the Metro site. The extent to which these materials are used in allocation remains to be seen.

As you will note in Section XXIII of the Order, additional signatories are contemplated. The current signatories are planning to draft a reasonable method of allocating removal costs by the end of January, 1990. At this point an approach based upon drums sent to Metro is contemplated. A meeting to discuss the draft allocation is planned for late January or February. Please let us know by March 7 if you are interested in commenting on the draft allocation method.

Once an allocation has been finalized, you will again be contacted and asked to sign the Order. Those who sign on will receive contribution protection while those who do not risk cost recovery actions by the EPA and contribution actions by the signatories to the Order.

Present plans are to confine the allocation to costs incurred to date, which will encompass the MK contract, EPA oversight costs reimbursable under the Order, prior technical work, and group expenses. The total should be in the range of \$6 million. Future expenditures will not be covered because the need for additional work is uncertain.

Please direct inquiries to this office. Written communications will be appreciated. If you must call, the number of my secretary, Margo Lopez, is (215) 972-1952 and the number of the paralegal involved in this matter, Diane Reznik, is (215) 972-8685.

Thank you for your prompt attention to this matter.

Sincerely,

Carl B. Everett/minl

CBE/mml Enclosures

cc: Metro PRP Committee

SDMS US EPA Region III Imagery Insert Form

	Site Name & OU:	METRO CONTAIN	NER CORP	Document ID: 2199430
	Site DSN: PA-2025	Site Status:	REMOVAL	Releasability: REL
	Some images in thi		legible or unav dicated below:	ailable in SDMS. Please see reason(s
	ILLEGIBLE due to b	oad source documents.	Images(s) in S	DMS equivalent to hard copy.
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	available in monoch		ument page(s) i	Unless otherwise noted, these pages ares s more legible than the images. The Records Center.
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X	Document is availal	ble at the EPA Region 3	3 Superfund Red	cords Center.
		Specify Type	of Document(s) / (Comments:
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Sun Refining and Marketing Company Ten Penn Center 1801 Market Street Philadelphia PA 19103-1699

> RECEIVED LEGAL DEPT.

JUN 2 5 1990

PAULETTE WOLFSON

June 15, 1990

Paulette Wolfson, Esq. Lyondell Petroleum One Houston Center Suite 1600 1221 McKinney Street P.O. Box 3646 Houston, TX 77253-3646

RE: Metro Container Superfund Site Trainer, PA

Dear Ms. Wolfson,

In response to our conversation several weeks ago concerning the Metro Container Superfund site, I have attempted to outline the facts I believe you will find helpful in determining your ultimate liability.

By way of background, the Atlantic Refinery, in Philadelphia, was purchased by John Deuss from Atlantic Richfield Company ("ARCO") on September 30, 1985. Such sale included ARCO's indemnification of the purchaser for any, and all, environmental liability, associated with the refinery, existing at the time of sale. Sun Refining and Marketing Company ("Sun") then purchased the Atlantic Refinery from John Deuss in 1988 which included a transfer of the ARCO indemnity.

As discussed, Metro's operating records indicate a significant business with Atlantic Richfield Company ("ARCO") and, presumably Atlantic/ARCO during the 1985-1987 period (the period determined by the PRP group to be used as the "allocation period"). Since Sun now owns the Atlantic Refinery we are seeking to identify our true liability with regard to this site. Since the allocation period includes 1985, it is Sun's contention that some of the volume

Paulette Wolfson, Esquire Page Two June 15, 1990

attributed to that year is covered by the ARCO indemnification, and therefore, is not Sun's liability.

It is our understanding that the data utilized in assessing PRP liability at this site has been shared with ARCO, and presumably with Lyondell. As you will note, the data is compiled on a calendar year basis. Sun has completed a review of the Atlantic records which indicate that a total of 1,341 drums were sent to the Metro site for reconditioning/recycling during the period September 30, 1985 - December 31, 1985. As a result, it appears that the remaining drums identified in the 1985 period are allocable to ARCO or, in this case, Lyondell.

We would appreciate your reviewing relevant documents and responding to Sun at your earliest convenience so that the PRP allocation with regard to Sun may be finalized. Should you have any questions concerning Sun's allocation, please contact me at (215) 977-3072.

Very truly yours,

The Marabuse Fracy
Helen Yarabinee Tracy

HYT:sma
HYT6-8.sma

One Houston Center 1221 McKinney, Suite 1600 P.O. Box 3646 Houston, Texas 77253-3646 Telephone 713 652 4587



Paulette S. Wolfson Counsel Environmental, Health and Safety

August 31, 1990

Mr. John Laager Atlantic Richfield Company Five Great Valley Parkway Suite 318 Malvern, PA 91355

RE: METRO CONTAINER SUPERFUND SITE

Dear John:

Enclosed is the correspondence from Sun Refining and Marketing Company which we discussed. As noted in the letter, Sun believes a portion of its allocation as a member of the PRP committee is related to the Philadelphia Refinery.

Sincerely,

Paulette Wolfson

Enclosures

cc: Joe Thiel-OHC

PSW:MC\083190 F:WP51\W8C90\LAAGER.LTR Sulstantiated infunda Sulstantiated infunda med before - Surefuel La mosquettiis in Refiner



ECEIVED LEGAL DEPT.

AUG 2 8 1990

PAULETTE WOLFSON Sun Refining and **Marketing Company** Ten Penn Center 1801 Market Street Philadelphia PA 19103-1699

August 23, 1990

Paulette Wolfson, Esq. Lyondell Petroleum One Houston Center Suite 1600 1221 McKinney Street P.O. Box 3646 Houston, TX 77253-3646

> RE: Metro Container Superfund Site Trainer, PA

Dear Ms. Wolfson,

I am writing to follow-up on the correspondence I sent to you concerning the above-referenced site (copy attached).

As the surface removal activities at this site are now complete, the PRP group is anxious to finalize allocations and prepare for the ultimate disposition of any outstanding claims. Sun Refining and Marketing Company ("Sun") is a member of the PRP group and, as such, is eager to finalize its allocation. As noted in the attached letter, the remaining piece to our allocation puzzle is the share allocable to the Atlantic Refinery (located in Philadelphia) for the time period 1985-1987, more specifically 1985.

We would appreciate your response to this issue as soon as possible so that Sun, and the PRP group, may endeavor to complete the allocation plan. Should you have any questions, please contact me at 215-977-3072.

Very truly yours,

Pilen Warabinee Tracy

Helen Warabinee Tracy

HYT8-21.hyt HYT:sma cc:J.C. Wilson



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Sun Refining and Marketing Company Ten Penn Center 1801 Market Street Philadelphia PA 19103-1699

June 15, 1990

Paulette Wolfson, Esq. Lyondell Petroleum One Houston Center Suite 1600 1221 McKinney Street P.O. Box 3646 Houston, TX 77253-3646

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We would appreciate your reviewing relevant documents and responding to Sun at your earliest convenience so that the PRP allocation with regard to Sun may be finalized. Should you have any questions concerning Sun's allocation, please contact me at (215)977-3072.

Very truly yours,

Helen Yarabinee Tracy

HYT:sma HYT6-8.sma bcc: E. J. Ciechon J. C. Wilson

2000



POST OFFICE BOX A

Metro Container Corp

SECOND & PRICE STREETS TRAINER, PENNSYLVANIA 19016 (215) *** TRAINER 485-6100



SUPPLIER OF DRUMS	QUANTITY	ADDRESS	TRANSPORTER	ADDRESS
AFCO		81 Commercial Ave. Avenel, NJ 07001	AFCO	Same
Gilbert Spruance Co.	4,708	Richmond & Tioga Phila., PA 19134	AMF Co.	81 Oak Forrest Rd. Sicklerville, NJ O
AMF Co.		81 Oak Forrest Rd. Sicklerville, NJ 08081	AMF Co.	Same
AMTRAK Receiving Dept.		Foot of Vandevere Ave. Wilmington, DE 19801	AMF Co.	See above
ARCO Chemical Co.		3801 W. Chester Pk. Newtown Sq., PA 19073	AMF Co.	See above
Atlantic Refining & Marketing	e e	3144 Passyunk Ave. Phila., PA 19145	AMF Co.	See above
Autoline Lubricants	1,207	900 S. Carolina St. Baltimore, MD 21231	AMF Co.	See above
E. C. Barnes Inc.		8632 Lincoln Way, W. St. Thomas, PA 17252	E.C. Barnes	Same
Callahan Chemical Co.	3,554	Broad & Filmore Ave. Palmyra, NJ 08065	AMF Co.	See above
Capitol Lubricants		569 Industrial Dr. Lewisberry, PA 17339	AMF Co.	See above
Chevron	22,143	P. O. Box 7408 Phila., PA 19101	Wiley	410 W. Oak Lane Glenolden, PA 1903
Conestoga Fuel	473	1145 Elizabeth Ave. Lancaster, PA 17607	AMF Co.	See above
Conestoga Foundry	249	P. O. Box 464 Hamburg, PA 19526	AMF Co.	See above
Wm. H. Cooper & Sons	18,796	320 Brown Street Phila., PA 19133	Cooper	Same
First State Steel Drum Co.		New Castle Ave. New Castle, DE 19720	First State	Same
Flippo Oil		3030 S. Main St.	Flippo Oil	Same

Harrisonburg, PA 22801

	ye Trus		equive (
SUPPLIER OF DRUMS	QUA IY	ADDRESS	TR PORTER	ADDRESS
Fritch Fuel Co.	7,093	116 River St. Bethlehem, PA 18015	AMF Co.	See abor
Jay Gress	-	P. O. Box 628 Norristown, PA 19404	Jay Gress	Same
C. B. Hoober & Sons		Main Street Intercourse, PA 17534	C. B. Hoober	Same
Industrial Solvents	2,149	RD #1 Box 511 York Haven, PA 17370	AMF Co.	See abo
J T M Drum		P. O. Box 169 Sayerville, NJ 08872	J T M Drum	Same
Wm. Jones & Sons, Inc.		230 Liberty St. Camden, NJ 08401	Wm. Jones	Same
Donald Kelly	3,168	2008 Federal St. Camden, NJ 08105	Donald Kelly	Same
Kessler Chemical		270 Street Road New Hope, PA 18938	AMF Co.	See abo
E. J. Koenig	958	P. O. Box 200 Bordentown, NJ 08505	AMF Co.	See abo
Lehigh Gas & Oil	356	Main Street Beaver Meadows, PA 182	Lehigh Gas 216	Same
Lightman Drum Co.	464	P. O. Box 22 Berlin, NJ 08009	Lightman Drum	Same
Mauger & Co., Inc.		1015 Baltimore Pk. Media, PA 19063	Mauger & Co.	Same
Lyondell Petrochemical		P.O. Box 75007 Accounts Payable Los Angeles, CA 90075	AMF Co.	See abo
Mobil Oil Co.	94,441	P. O. Box 428 Paulsboro, NJ 08066	Mobil Oil Co. AMF Co.	Same See abo
National Solvents	3,223	8735 Route 13 Tullytown, PA 19007	AMF Co.	See abo
Norton Petroleum	1,063	290 Possum Park Rd. Newark, DE 19171	AMF Co.	See abo
Robert O'Donnell	7,348	607 Wynne Rd. Springfield, PA 19064	O'Donnell	Same
Petroleum Products		900 Eisenhower Blvd. Harrisburg, PA 17105	AMF Co.	See abo

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•	SUPPLIER OF DRUMS	QUANTITY	ADDRESS	TRANSPORTER	ADDRESS
	Pioneer Oil Co.		61st & Passyunk Ave. Phila., PA 19153	AMF Co.	See above
	Petrolite Corp.		4th & Saville Ave. Eddystone, PA 19013	AMF Co.	See above
	Quality Container Corp.	1,626	Trenton & Ontario Sts. Phila., PA 19134	Quality Cont.	Same
	Reit Lubricants	1,499	899 Mearns Rd. Warminster, PA 18974	AMF Co.	See above
į	Reliable Recyclers		P. O. Box 4 Smoketown, PA 17675	Reliable	Same
1 1	Rhodes Drums		2000 Federal St. Camden, NJ 08105	Rhodes Drums	Same
	Sentry Paint & Chemical		P. O. Box 269 Darby, PA 19023	AMF Co.	See above
	Scot Lubricants	3,044	1715 E. Tremont Allentown, PA	AMF Co.	See above
	Sunolin		P. O. Box 609 Claymont, DE 19703	AMF Co.	See above
,	W. N. Stevenson	10,600	246 Rockhill Rd. Bala Cynwyd, PA 19004	AMF Co.	See above
:	Sun Oil Co.	7,189	P. O. Box 395 Marcus Hook, PA 19064	AMF Co.	See above
;	Sun Transport		P. O. Box 2225 Aston, PA 19104	AMF Co.	See above
:	Superior Drum	2,863	218 Crafton Ave. Pitman, NJ 08071	Superior	Same
	Tasty Baking Co.		2801 Hunting Park Ave. Phila., PA 19129	AMF Co.	See above
F	Herb Toy, Inc.	1,076	Box 200 Franklinville, NJ 0832	Herb Toy 2	Same
. 1	Cunnel Barrel & Drum		85 Triangle Blvd. Carlstadt, NJ 07072	Tunnel Barrel	Same
τ	J. S. Steel Corp.		Fairless Works Fairless Hills, PA 1904	AMF Co.	See above
j	J. T. Warring & Sons	480	4545 S Street Capitol Hgts., MD 20743	Warring 3	Same

SUPPLIER OF DRUMS QUANTITY	ADDRESS	TRANSPORTER	ADDRESS
Westinghouse Electric	600 W. Dutton Mill Rd. Aston, PA 19014	AMF Co.	See above
Witco Chemical Co	3300 West 4th St. Trainer, PA 19013	AMF Co.	See above
Zenith Metal Products	200 Commerce Drive Highland Ind. Park Aston, PA 19014	AMF Co.	See above
Zurn 0i1 4,019	2736 N. Broad St. Phila., PA 19132	AMF Co.	See above
BP 0il Co. 4,556	P. O. Box 428 Marcus Hook, PA 19016	AMF Co.	See above